

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF
AMERICA,**

Plaintiff and Counter-Defendant,

V.

ACKERMAN MCQUEEN, INC.,

Defendant and Counter-Plaintiff,

and

**MERCURY GROUP, INC., HENRY
MARTIN, WILLIAM WINKLER, AND
MELANIE MONTGOMERY**

Defendants.

Case No. 3:19-cv-02074-G

PLAINTIFF'S PRETRIAL DISCLOSURE PURSUANT TO FED. R. CIV. P.
26(a)(3)(A)(iii)

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A)(iii) and the Court's October 13, 2020 Scheduling Order (ECF 174), as amended (ECF 358), Plaintiff National Rifle Association of America ("NRA") hereby submits its Trial Exhibit List.

The NRA may, at its sole election, request that the Court take judicial notice of, or otherwise offer any of, the below listed documents into evidence at the time of the trial. The NRA further reserves the right to offer any documents, which may be designated or offered by any Defendant. The NRA reserves the right to offer or use any exhibits (whether designated below or by the NRA) as may be necessary for cross-examination, impeachment, or rebuttal.

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
1)	01/05/94	Internal Control—Integrated Framework issued by Committee of Sponsoring Organizations of the Treadway Commission (September 1992, amended May 1994)	
2)	05/01/99	1999 Services Agreement	NRA-AMc_00048503-48514
3)	01/16/01	2000-2001 Tedrick Audit Report	NRA-AMc_00137590-137593 NRA-AMc_00089371-89374 NRA-AMc_00185512-185518 NRA-AMc_00185508-185511
4)	07/30/02	2000-2002 Tedrick Audit Report	NRA-AMc_00089371-89374
5)	11/17/03	NRA Travel and Business Expense Reimbursement Policy	NRA-AMc_00068373-68387
6)	11/12/04	2004 Tedrick Audit Report	NRA-AMc_00185512-185514
7)	12/30/05	2005 Tedrick Audit Report	NRA-AMc_00185515-185518
8)	03/03/06	Letter - W. Brewer to Makris re Mercury Group's termination of the professional relationship with BAC in response to Makris termination letter which is also attached	Exhibit 25 to Makris deposition (not produced by NRA or AMc)
9)	03/16/06	Letter dated 03/16/2006- from AMc to William A. Brewer response to letter of March 3 by W. Brewer to AMc.	
10)	11/28/07	2007 Tedrick Audit Report	NRA-AMc_00185508-185511
11)	02/14/12	Workamajig License Agreement	n/a
12)	07/19/12	Email - Cox to Christman	NRA-AMc_00199015-199017
13)	04/01/13	Dycio - Letter of Engagement for Legal Services April 2013	
14)	09/24/13	Here's A Dude Shooting An Elephant In The Face On NBC Sports Network	None (article)
15)	09/26/13	NRA Strategist Kills Elephant On NBC Sports Show	None (article)
16)	09/28/13	NBC Sports Network Cancels NRA-Sponsored Elephant Hunting Show	None (article)
17)	09/30/13	Exclusive_ NRA-Sponsored Elephant Hunter Defends Hitler Comparison, Vows TV Return _ Media Matters for America	None (article)
18)	12/19/14	2014 Tedrick Audit Report	NRA-AMc_00185505-185507
19)	01/03/15	Email - Tedrick to Tavangar re 2015 budget adjustments	NRA-AMc_00141958-141959
20)	01/15/15	Invoices 121927 - 133356	NRA-AMc_00164353-00164420
21)	02/15/15	Invoices 124247-124268	NRA-AMc_00168100 - NRA-AMc_00168304
22)	02/20/15	Invoices 124592-126496	NRA-AMc_00056393 - NRA-AMc_00056556
23)	04/16/15	Ackerman McQueen Monthly production invoice	NRA-AMc_00056440
24)	04/22/15	Requesting backup for Invoice 126365	AMc_000997 - AMc_000998
25)	05/01/15	Invoices 126800-130885	NRA-AMc_00056150 - NRA-AMc_00056392
26)	05/29/15	Email from R. Tedrick to N. Tavangar	AMc_000999 - AMc_0001000
27)	05/29/15	Scheduling meeting to review 2015 budget sheet	AMc_001001 - AMc_001002
28)	08/06/15	Checklist For Transitioning To A New Digital Agency- Search Engine Land	
29)	09/29/15	Ackerman Invoices payment delay	AMc_001012-1013
30)	11/18/15	2016 Budget - final	AMcTX-00065395
31)	12/21/15	Invoice questions from Tedrick	AMc_001025 - AMc_001026
32)	12/31/15	2015 AMc financial statements (audited)	AMcTX-00068007-68023
33)	01/05/16	Email from R. Tedrick to N. Tavangar	AMc_001030 - AMc_001031
34)	01/14/16	Invoices 133652 - 143533	NRA-AMc_00101908-00101963
35)	01/14/16	Invoices 133643-133651	NRA-AMc_00167350 - NRA-AMc_00167574
36)	02/17/16	Invoices 136411-139076	NRA-AMc_00055942 - NRA-AMc_00056149
37)	02/17/16	Invoices 130373-133418	NRA-AMc_00063517 - NRA-AMc_00063714
38)	02/22/16	Email string re NRA daily flowcharts	AMc-000177
39)	02/23/16	Email - Montgomery to Parker re cost of FOX spots	AMc-000155-156
40)	02/28/16	Makris Expense Report February 2016 "Travel" (page 3 of 9)	AMc-0030733
41)	03/06/16	Email from R. Tedrick to N. Tavangar re Monthly fee Invoices	AMc_001040
42)	03/08/16	2015 Management representation letter	NRA-NYAGCOMMDIV-00001339-1343
43)	03/11/16	Ackerman McQueen Monthly production invoice	NRA-AMc_00056133
44)	03/30/16	Hale to Greenberg, Montgomery, Darley	AMcTX-00275655
45)	03/31/16	Makris Expense Report March 2016 "Travel" (page 5 of 9)	AMc-0030735

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
46)	05/05/16	Correspondence, M. Allen and N. Tavangar	NRA-AMc 00200019-21
47)	06/01/16	Correspondence, M. Allen and N. Tavangar	NRA-AMc 00200023-24
48)	06/01/16	Correspondence, M. Allen and E. Van Horn	NRA-AMc 00200025-27
49)	08/08/16	PIP / AMc Contract (Not Executed)	PIP-00004124
50)	08/08/16	Business Intelligence Assessment Letter Agreement from PIP dated 08/08/2016 between Ackerman McQueen and PIP	PIP-00004124-31
51)	08/09/16	PIP-AMc agreement re Business Intelligence Assessment (draft)	PIP-00003685-3692
52)	08/09/16	Business Intelligence Assessment Letter Agreement from PIP dated 08/09/2016	PIP-00004094-101
53)	08/17/16	PIP / AMc Contract (Not Executed)	PIP-00003947
54)	08/17/16	Draft Letter agreement between PIP and AM	PIP-00003947-53
55)	08/24/16	Non Executed Letter agreement dated 8/24/2016 between PIP and AM	PIP-00003939-46
56)	08/30/16	PIP-AMc agreement re Business Intelligence Assessment, dated 08/15/16	PIP-00003755-3762
57)	09/29/16	Invoices 139097 - 141002	NRA-AMc_00167785 - NRA-AMc 00167987
58)	10/06/16	NRA 2017 Budget Planning prepared by AMc	NRA-AMc 00057337-57351
59)	10/13/16	Invoices 143169-144626	NRA-AMc_00055055 - NRA-AMc 00055122
60)	10/14/16	Letter Agreement, executed	PIP-00000027-34
61)	10/18/16	Invoices 141850-141871	NRA-AMc_00167989 - NRA-AMc 00168098
62)	10/21/16	PIP / Waypoint License Agreement (Executed)	PIP-00004113
63)	10/22/16	Ackerman McQueen - Waypoint Licenses Signed by Jesse Greenberg on 10/21/2016	PIP-00004113-15
64)	10/24/16	PIP-AMc agreement re Design and Development of Dashboard, dated 10/14/16	PIP-00000027-34
65)	12/01/16	Invoices 144338-145143	NRA-AMc_00054999 - NRA-AMc 00055054
66)	12/06/16	2017 Budget - revised	AMcTX-00065394
67)	12/29/16	Invoices 145221-145808	NRA-AMc_00063022 - NRA-AMc 00063088
68)	12/31/16	2016 AMc consolidated statement of income	AMcTX-00053145-53146
69)	12/31/16	2016 AMc's redacted record of "Inside Labor Cost," "Labor Hours," "Overhead Allocation," and "Misc Direct and T&E Total" for the NRA and all AMc clients	AMcTX-00053147-53156
70)	12/31/16	2016 AMc financial statements (audited)	AMcTX-00068024-68040
71)	01/05/17	Invoices 143197 - 153672	NRA-AMc_00101844 - NRA-AMc 00101907
72)	01/05/17	AM Project Change Request #1 (Issued 12/12/2016)	PIP-00000061-63
73)	01/12/17	Greenberg to various AMc employees regarding the opportunities to use the dashboard for other clients.	AMcTX-00276141
74)	01/14/17	PIP Project Change Request (Executed)	PIP-00000061
75)	01/16/17	Kobler to Darley et al. regarding the need to improve engagement.	AMcTX-00325781
76)	01/18/17	Wang to Greenberg and Rinaldi (PIP)	AMcTX-00276922
77)	01/19/17	Invoices 145954-147452	NRA-AMc_00054976 - NRA-AMc 00054998
78)	01/19/17	Cary Guard Contract (Not Executed)	PIP-00003648
79)	01/23/17	Weekly Status Report regarding the “NRA Dashboard”	AMcTX-00276956
80)	01/25/17	Kobler to R. McQueen.	AMcTX-00276979
81)	01/26/17	Greenberg to Parker	AMcTX-00277011
82)	01/31/17	Makris Expense Report January 2017 "Travel" (page 5 of 11)	AMc-0031135
83)	01/31/17	Makris Expense Report January 2017 "Travel" (page 6 of 11)	AMc-0031136
84)	01/31/17	Makris Expense Report January 2017 "Travel" (page 7 of 11)	AMc-0031137
85)	01/31/17	Makris Expense Report January 2017 "Travel" (page 8 of 11)	AMc-0031138
86)	01/31/17	Makris Expense Report January 2017 "Travel" (page 9 of 11)	AMc-0031139
87)	02/06/17	PIP Project Change Request (Executed)	PIP-00000064
88)	02/06/17	AM Project Change Request #2 (Issued 01/17/2017)	PIP-00000064-65
89)	02/10/17	Ackerman McQueen Monthly production invoice	NRA-AMc_00062995 - NRA-AMc 00062997
90)	02/10/17	Wang to Greenberg	AMcTX-00277205
91)	02/27/17	Greenberg to Wang regarding NRATV digital campaigns.	AMcTX-00277533
92)	02/27/17	Greenberg and Wang set up call for 3/2/17	AMcTX-00277994
93)	02/28/17	Makris Expense Report February 2017 "Travel" (page 4 of 6)	AMc-0031195
94)	03/07/17	PIP Project Change Request (Executed)	PIP-00000066
95)	03/08/17	2016 Management representation letter	NRA-NYAGCOMMDIV-00001331-1334
96)	03/08/17	AM Project Change Request #4 (Issued 02/28/2017)	PIP-00000066
97)	03/15/17	Ackerman McQueen Monthly production invoice	NRA-AMc 00062932
98)	03/20/17	Invoices 147611-148333	NRA-AMc_00054878 - NRA-AMc 00054943
99)	03/21/17	NRATV March ’17 Performance PowerPoint presentation.	AMcTX-00278583
100)	03/22/17	Wang to O’Brien (PIP) regarding NRATV Dashboard Priorities Recap	AMcTX-00333045
101)	03/27/17	Invoices 147622C-149674	NRA-AMc_00054698 - NRA-AMc 00054764
102)	03/27/17	Invoices 147622B-150672	NRA-AMc_00054856 - NRA-AMc 00054874
103)	03/28/17	Invoices 146446 - 146750	NRA-AMc_00165984 - NRA-AMc 00166039
104)	04/04/17	Invoices 146581-146827	NRA-AMc_00166094 - NRA-AMc 00166125
105)	04/20/17	Email - Powell to Montgomery	AMc 000203-000207
106)	04/25/17	NRATV Powerpoint Presentation - NRATV Q1 2017 Analytics	AMcTX-00006696
107)	04/27/17	Invoices 147112 - 147472	NRA-AMc_00166040 - NRA-AMc 00166093
108)	04/30/17	2017 Services Agreement	NYAG-00120835-120845 NRA-AMc_00183414-183424 NRA-AMc_00050600-50610 AMc-057823-57834 AMcTX-00000162-172
109)	04/30/17	2017 Services Agreement	NYAG-00120835-120845 NRA-AMc_00183414-183424 NRA-AMc_00050600-50610 AMc-057823-57834 AMcTX-00000162-172
110)	05/02/17	Email - Wang to Greenberg	AMcTX-00294544-70
111)	05/10/17	NRATV Powerpoint Presentation - NRATV Video Analytics Solutions Overview	AMcTX-00045760 / AMc-002656
112)	05/11/17	Invoices 148749	AMc-0031227 - AMc-0031231
113)	05/11/17	Invoices 148749-149788	NRA-AMc_00054765 - NRA-AMc 00054855

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Exhibit	Date	Description	Bates numbers
114)	05/15/17	Wang to Greenberg	AMcTX-00295054
115)	05/16/17	Email - Plunkett to Godstrey	NRA-AMc_00001510-1513
116)	05/17/17	Wang to Greenberg	AMcTX-00295144
117)	05/31/17	Makris Expense Report April/May 2017 "Travel Tips"	AMc-0031446
118)	06/23/17	Examble of sharing login credentials	AMcTX-00295731
119)	07/07/17	Wang to Azimi	AMcTX-00296068
120)	07/13/17	Invoice 149174	NRA-AMc_00100010
121)	07/13/17	Invoices 149122 - 149174	NRA-AMc_00100014 - NRA-AMc_00100022
122)	07/21/17	Parker to Wang	AMcTX-00319110
123)	08/01/17	Invoices 147622D - 150784	NRA-AMc_00166573 - NRA-AMc_00166635
124)	08/25/17	Email - Rinaldi (PIP) to Wang	AMcTX-00336708
125)	08/31/17	NRATV Stats as of: August 31, 2017 - Presentation	AMc-002929-55
126)	09/01/17	Invoices 151498-152124	NRA-AMc_00062871 - NRA-AMc_00062911
127)	09/03/17	NRATV Powerpoint Presentation - NRATV 2018 Vision Discussion	AMcTX-00045939 / AMc-002835
128)	09/11/17	PIP Project Change Request (Executed)	PIP-00000067
129)	09/11/17	AM Project Change Request #5 (Issued 09/05/2017)	PIP-00000067
130)	09/15/17	NRATV Powerpoint Presentation - NRATV Analytics Discussion	AMcTX-00045922 / AMc-002818
131)	09/19/17	Invoices 150705 - 150739	NRA-AMc_00166371 - NRA-AMc_00166422
132)	10/06/17	ICCO announces Helsinki Declaration	
133)	10/17/17	Invoices 153039-153632	NRA-AMc_00054474 - NRA-AMc_00054529
134)	10/18/17	NRATV Powerpoint Presentation - NRATV Q3 2017 YTD Metrics	AMcTX-00045948 / AMcTX-00038748
135)	10/20/17	Sheppard Mullin legal invoices for Dana Loesch contract, dated 10/20/17, 11/14/17, and 12/14/17	AMc-0031508-31524
136)	10/26/17	Email - Darley to Wang	AMcTX-00337725
137)	11/02/17	Invoices 152840 - 152116	NRA-AMc_00166520 - NRA-AMc_00166572
138)	11/07/17	Email between E. Wang & A. Bilinski	AMcTX-00338221
139)	11/22/17	NRATV Powerpoint Presentation - NRATV The Clenched Fist of Truth	AMcTX-00046044 / AMc-002929
140)	12/04/17	Email- Wang to Bilinski	AMcTX-00323214
141)	12/20/17	NRATV Analytics - NRATV Year1: Analytics & Valuation - Mass Media Approach and AM Approach - Oct. 2016 thru Dec. 2017	AMc-002741-71
142)	12/20/17	The Power of NRATV - Crafting and Owning a Narrative	AMc-002853-2928
143)	12/20/17	NRATV Analytics	AMc-002956-90
144)	12/28/17	Invoice	NRA-AMc_00054527
145)	12/30/17	Wang to Greenberg	AMcTX-00325401
146)	12/31/17	NRATV Powerpoint Presentation - The Power of NRATV - Crafting and Owning the Narrative	AMcTX-00045966 / AMc-002853
147)	12/31/17	2017 AMc consolidated statement of income	AMcTX-00053164-53165
148)	12/31/17	2017 AMc's redacted record of "Inside Labor Cost," "Labor Hours," "Overhead Allocation," and "Misc Direct and T&E Total" for the NRA and all AMc clients	AMcTX-00053166-53175
149)	12/31/17	2017 AMc financial statements (audited)	AMcTX-00068041-68056 AMc-056721-056736
150)	01/01/18	Dana Loesch employment agreement	AMc-000055-AMc_000076; AMcTX-00045557 - 455578
151)	01/03/18	NRATV Powerpoint Presentation - NRATV Year 1 Analytics & Valuation	AMcTX-00064865 / AMcTX-00045892 / AMc-002741
152)	01/05/18	2018 Budget NRA final	AMcTX-00065392-65393
153)	01/05/18	Invoices 154771-154766	NRA-AMc_00052128 - NRA-AMc_00052209
154)	01/05/18	Ackerman McQueen Monthly production invoice	NRA-AMc_00052211 - NRA-AMc_00052212
155)	01/09/18	Email from R. McQueen to A. McQueen	AMcTX-00003262-3309
156)	01/09/18	Email exchange between J. Greenberg and B. Nash	AMcTX-00042332-42373
157)	01/13/18	NRA Board Meeting Minutes	NRA-AMc_00076056
158)	01/16/18	Ex L to Spofford Decl - Email from N. Tavangar to P. Farrell	AMcTX-00061803
159)	01/16/18	Invoices 153831 - 157231	NRA-AMc_00102085 - NRA-AMc_00102108
160)	01/19/18	Memo - NRATV Monetization Next Steps/Action Plan	AMcTX-00037291-37295
161)	01/21/18	Ex K to Spofford Decl - Email from G. Spofford	AMcTX-00061804
162)	01/23/18	NRATV Powerpoint Presentation - NRATV 2017 Analytics (including NOIR 2017 Metrics)	AMcTX-00004463 / AMcTX-00014990-15005 / AMc-039153 / AMcTX-00015576
163)	01/23/18	NRATV Powerpoint Presentation - NOIR 2017 Metrics NRATV	AMcTX-00014990-15005 / AMc-039153 / AMcTX-00015576
164)	01/31/18	Email - Brandon Winkler's approval of travel advance	AMc-057991
165)	01/31/18	2018 AMc's redacted record of "Inside Labor Cost," "Labor Hours," "Overhead Allocation," and "Misc Direct and T&E Total" for the NRA and all AMc clients	AMcTX-00053185-53195
166)	02/01/18	Email - Wang to Greenberg et al re monetization dashboard that he built	AMcTX-00046799
167)	02/01/18	Invoices 155305-155313	NRA-AMc_00052292 - NRA-AMc_00052352
168)	02/02/18	Email - Grable to Cremer, Montgomery, Phillips	AMcTX-00007396-7397
169)	02/07/18	Email (attachment) - Wang to Floyd	AMcTX-00051080-83
170)	02/09/18	Ex J to Spofford Decl - Email from B. Nash to G. Spofford	AMcTX-00007460
171)	02/09/18	NRATV Powerpoint Presentation - NRA America's Most Patriotic Brand	AMcTX-00045742 / AMc-002956
172)	02/18/18	Ackerman Media Buy billings	AMcTx-00024842 - AMcTx-00024845
173)	02/19/18	Email - Warner (EVP/Creative Director) to Cremer	AMcTX-00043450, AMcTX-00007530-7532, AMcTX-00043471-43489, AMcTX-00043451-43469
174)	02/19/18	Ex I to Spofford Decl - Email from E. Wang to G. Spofford	AMcTX-00050314
175)	02/20/18	Example of Invoice billed to the NRA by AMc that contained vague, descriptive narratives like "Per Approved Budget"	NRA-AMc_00052221
176)	02/21/18	Where the N.R.A. Speaks First and Loudest - The New York Times	None (article)

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Exhibit	Date	Description	Bates numbers
177)	02/21/18	Invoices 155520-156894	NRA-AMc_00052507 - NRA-AMc_00052543
178)	02/26/18	Email - Holmes to Henry Martin, Montgomery, Cremer and Petersen	AMc-058967
179)	03/03/18	Email - Wang to Greenberg and Montgomery	AMcTX-00004485-4510
180)	03/03/18	NRATV Powerpoint Presentation - Monetization	AMcTX-0004485-4510
181)	03/05/18	Letter - W. Brewer to Frazer re The NRA Corporate Relationships Strategy - BAC retention	NRA-BK-00060708-60714
182)	03/05/18	NRA TV: Last Week Tonight with John Oliver (HBO)	
183)	03/07/18	NRATV Powerpoint Presentation - NRATV Monetization Report	AMcTX-00003382 / AMcTX-00000763 / AMcTX-00003376
184)	03/07/18	2017 Management representation letter signed	NRA-NYAG-00073299-73302
185)	03/08/18	Email - Cox to Cox	NRA-AMc_00199023-199024
186)	03/09/18	Email - Stinchfield to Revan and H. Martin	AMcTX-00003383-3384
187)	03/12/18	Email - Payne to Revan	AMcTX-00003397
188)	03/15/18	Email - Stinchfield to Revan and H. Martin	AMcTX-000003409-3410
189)	03/18/18	Invoices 155966-157106	NRA-AMc_00052416 - NRA-AMc_00052460
190)	03/21/18	National Rifle Association Annual Meetings and Exhibits 2018	AMcTX-00001637
191)	03/22/18	Lease agreement between iland Internet Solutions and Ackerman	AMcTX-00045414-45455
192)	03/28/18	Email - Frazer to Montgomery and Cremer	AMcTX-00000609
193)	03/28/18	Lease agreement between Cisco Capital and Ackerman	AMcTX-00045403-45407
194)	03/31/18	Makris Expense Report Jan-Mar 2018 "FEB Supplemental" and supporting documentation to back up OOP amounts charged	AMc-0032536-32543
195)	04/01/18	Invoices 156591-156772	NRA-AMc_00052595 - NRA-AMc_00052639
196)	04/03/18	Invoices 156809-157425	NRA-AMc_00052545 - NRA-AMc_00052593
197)	04/04/18	M. Montgomery to B. Brewer regarding time to speak	AMc-056625
198)	04/04/18	Email - Madrid to W. Brewer notifying W. Brewer that Madrid has "been asked to assist AM in the NRA matter"	NRA-AMc_00185607
199)	04/06/18	Email string re enclosed digital order and flowchart for Retargeting (DBM) and Facebook amounts.	AMcTX-00001636
200)	04/06/18	Digital Order for Retargeting (DBM) and Facebook Amounts.	AMcTX-00001638-42
201)	04/09/18	NRATV Powerpoint Presentation - NRATV 2018 Q1 Analytics & Valuation	AMcTX-00045817 / AMc-002713
202)	04/10/18	Correspondence from W. Brewer to J. Madrid re discussions involving compliance and common AMc matters	
203)	04/12/18	Follow up to Correspondence from W. Brewer to J. Madrid re discussions involving compliance and common AMc matters	
204)	04/13/18	Memo with attendees at NRATV meetings	AMc-059032
205)	04/13/18	Email - Treadwell to Nancy Martin	AMcTX-00002564
206)	04/14/18	A. McQueen email to Brewer	
207)	04/16/18	Email from A. McQueen to W. Brewer	
208)	04/17/18	Email from W. Brewer to Jay Madrid	
209)	04/17/18	Email from Jay Madrid to W. Brewer	
210)	04/19/18	Email from Jay Madrid to W. Brewer	
211)	04/19/18	Email from W. Brewer to Jay Madrid	
212)	04/20/18	Invoices 157437-157803	NRA-AMc_00052641 - NRA-AMc_00052664
213)	04/20/18	Email from Jay Madrid to W. Brewer re cooperation	
214)	04/25/18	Email - NRATV media request denied by AMc.	AMc-058428
215)	04/27/18	Correspondence from W. Brewer to J. Madrid	
216)	05/01/18	NRATV Powerpoint Presentation - NRATV Q1 2018 Analytics	AMcTX-00036945
217)	05/02/18	Email from J. Madrid to W. Brewer	
218)	05/02/18	Email from W. Brewer to J. Madrid	
219)	05/02/18	NRA v. Lockton Affinity Series of Lockton Affinity, LLC, et al., Case 18-cv-00639 (E.D. Va. 2018)	
220)	05/04/18	Email from W. Brewer to J. Madrid	
221)	05/06/18	2018 Services Agreement	AMc-056592-AMc-56593 NRA-AMc_00057325-57326
222)	05/06/18	B. Brewer email to Madrid	AMcTX-00065480 - AMcTX-00065482
223)	05/06/18	Email from W. Brewer to J. Madrid	
224)	05/07/18	Email - Cremer to Pierron	AMcTX-00040216-40217
225)	05/07/18	NRA Board Meeting Minutes	NRA-AMc_00075497
226)	05/07/18	Audit Committee Report	NRA-BK-00033836-37
227)	05/07/18	Email from J. Madrid to W. Brewer	
228)	05/08/18	Lease agreement between Dell Financial Services and Ackerman	AMcTX-00045408-45413
229)	05/12/18	Email from W. Brewer to J. Madrid	
230)	05/14/18	Email from J. Madrid to W. Brewer	
231)	05/14/18	Email from J. Madrid to W. Brewer	
232)	05/15/18	North employment agreement	AMc-056595-056604 NYAG-00180410-NYAG-00180419
233)	05/15/18	Projected increases to NRA fees due to hiring of North	AMcTX-00067704
234)	05/15/18	Invoice	NRA-AMc_00052611
235)	05/16/18	Email from W. Brewer to J. Madrid	
236)	05/17/18	AMc invoice re Out of Pocket Expenses	AMc-0032289-32314
237)	05/21/18	Email from W. Brewer to J. Madrid	
238)	05/29/18	B. Brewer requests from Madrid	AMcTX-00065619
239)	06/07/18	Email from W. Brewer to J. Madrid	
240)	06/11/18	Email from W. Brewer to J. Madrid	
241)	06/12/18	Madrid delaying meetings	AMcTX-00065631
242)	06/13/18	Madrid to B. Brewer regarding M. Montgomery	AMcTX-00065633
243)	06/19/18	Madrid and B. Brewer email	AMcTX-00065637
244)	06/21/18	Invoice 157570	NRA-AMc_00173989 - NRA-AMc_00173990
245)	06/22/18	Email from W. Brewer to J. Madrid	
246)	06/28/18	Invoices 158039-158118	NRA-AMc_00174005 - NRA-AMc_00174007
247)	06/30/18	Makris Expense Report June 2018 "Travel"	AMc-0032418-32419
248)	07/02/18	B. Brewer to Madrid	AMcTX-00065639
249)	07/02/18	Email from J. Madrid to W. Brewer	
250)	07/03/18	Invoices 158196 - 158210	NRA-AMc_00174234 - NRA-AMc_00174250
251)	07/07/18	Email - Hart to Montgomery	AMcTX-00041539
252)	07/10/18	Email - Hart to Montgomery	AMcTX-00041549

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
253)	07/10/18	Email - Hart to Montgomery	AMcTX-00041551-41552
254)	07/10/18	Email - Spray deposition (VA), Hart to Montgomery	
255)	07/11/18	AMc invoice - Out of Pocket Expenses	AMc-037073
256)	07/12/18	Invoices 158045-158060	NRA-AMc_00173991 - NRA-AMc_00174004
257)	07/12/18	Invoices 157844-158232	NRA-AMc_00174083 - NRA-AMc_00174131
258)	07/12/18	Invoices 157857-157903	NRA-AMc_00174132 - NRA-AMc_00174135
259)	07/13/18	Email - Rowling to Tedrick	NRA-AMc_00063924-63926 NRA-AMc_00068920-68921
260)	07/17/18	Email - Hart to Montgomery	AMcTX-00041562
261)	07/19/18	Invoices 158032	NRA-AMc_00174032 - NRA-AMc_00174033
262)	07/23/18	Email from W. Brewer to J. Madrid	
263)	07/24/18	Email from J. Madrid to W. Brewer	
264)	07/26/18	Invoice 158521	NRA-AMc_00174137 - NRA-AMc_00174138
265)	07/26/18	Correspondence from W. Brewer to J. Madrid	
266)	07/31/18	Makris Expense Report July 2018	AMc-0032819-32859
267)	07/31/18	Invoices 158751 - 159070	NRA-AMc_00174299 - NRA-AMc_00174368
268)	08/01/18	Email from Jay Madrid to W. Brewer	
269)	08/01/18	Email from W. Brewer to J. Madrid re talk	
270)	08/02/18	Invoice 159009	NRA-AMc_00174251 - NRA-AMc_00174252
271)	08/03/18	Letter from W. Brewer to J. Madrid	
272)	08/03/18	Article - Dylan Matthews, The National Rifle Associaiton, America's most powerful lobby, claims it's in financial crisis. What?, Vox	
273)	08/06/18	Email from M. Erstling to R. Tedrick and J. Powell	NRA-AMc_00188206
274)	08/06/18	Vendor Reduction Contact List	NRA-AMc_00188207 (produced in native)
275)	08/07/18	J. Madrid to W. Brewer	
276)	08/08/18	Letter - Phillips to Bill Winkler	AMc-058776 NRA-AMc_00068309 NRA-AMc_00063974-00063976
277)	08/08/18	Letter - Phillips to Bill Winkler	AMc-058777-58778 NRA-AMc_00068307-68308
278)	08/09/18	Email - J. Romanovich to WLP	N/A
279)	08/13/18	Letter - Bill Winkler to Phillips re 8/8/18 letter	AMcTX-00002893-2894 NRA-AMc_00063983-63984
280)	08/13/18	Email - Cremer to Pierron (Landini)	AMcTX-00005432-5434
281)	08/14/18	Email - Montgomery to Makris and Tavangar	AMcTX-00019192-19194
282)	08/14/18	Letter (draft) - Phillips to Bill Winkler	NRA-AMc_00057152 AMc-057545
283)	08/14/18	Draft Letter from W. Phillips to W. Winkler	NRA-AMc_00063993
284)	08/14/18	Email - Counsel for MMP to NRA	NRA-AMc_00068438
285)	08/14/18	Email - R. Charnley to W. Phillips	NRA-AMc_00068438 - NRA-AMc_00068442
286)	08/15/18	Presentation of NRATV 2018 YTD: Analytics Executive Overview YTD thru August 15, 2018	AMc-037169-82
287)	08/16/18	Invoices 159089-159308	NRA-AMc_00174139 - NRA-AMc_00174142
288)	08/20/18	Email Chain between J. Greenberg & E. Ned Taking down the Dashboard	AMcTX-00054759
289)	08/22/18	Letter - Ryan to W. Brewer	AMcTX-00065340-65342
290)	08/24/18	Email - Bill Winkler to Revan, Brandon Winkler and Montgomery	AMcTX-00036386-36387
291)	08/24/18	Email - Montgomery to Bill Winkler	AMcTX-00036388-36389
292)	08/24/18	Article - David Cole, ACLU.org, New York State Can't Be Allowed to Stifle the NRA's Political Speech	
293)	08/27/18	Email from B. Winkler to W. Phillips	AMc-057577
294)	08/27/18	Documents in response to request for Carryguard items	AMc-057578-79
295)	08/27/18	Addressing issues of Aug 14, 2018 letter	AMc-057580 - AMc-057581
296)	08/27/18	Letter - Bill Winkler to Phillips re clarifications on document request re examination of files, books and records	AMcTX-00003702-3703
297)	08/27/18	Letter from W. Brewer to S. Ryan responding to August 24th letter	
298)	08/28/18	Invoices 158755-159590	NRA-AMc_00174211 - NRA-AMc_00174233
299)	08/29/18	NRATV Powerpoint Presentation - NRATV Analytics through 08/01/18	AMcTX-00014856
300)	08/29/18	NRATV Powerpoint Presentation - NRATV 2018 YTD Executive Overview	AMcTX-00045790
301)	08/29/18	Review Ackerman books and records	NRA-AMc_00057263 - NRA-AMc_00057265
302)	08/29/18	North Conflicts Questionnaire	NRA-AMc_00171317
303)	08/30/18	Invoices 159722-732	NRA-AMc_00174143 - NRA-AMc_00174159
304)	08/30/18	Invoices 160504-160517	NRA-AMc_00174373 - NRA-AMc_00174389
305)	09/01/18	Letter from W. Brewer to S. Ryan regarding North Contract	NRA-AMc_00199979
306)	09/04/18	Winkler Letter to Phillips Re Audit Protocol	AMC_057595
307)	09/04/18	Employment Agreement of Dave Valinski	AMc-036766
308)	09/04/18	Email - Montgomery to Tavangar	AMc-059217
309)	09/05/18	Letter from J. Madrid to W. Brewer	
310)	09/06/18	Email - Montgomery forwarding to Revan an email from Hart (dated 7/10/18) re questions by tax consultant on terms of North contract in the context of the form 990 filing. Hart notes "Audit will receive only the info contained in your summary" and "[q]uestion six [whether show hosts are independent contractors or employees of AMc] can be helpful depending on what you tell me. I assume they are all paid and the ON contract tracks the standard contract."	AMcTX-00037323
311)	09/06/18	Letter from W. Brewer to J. Madrid	
312)	09/06/18	Chain of correspondence between W. Brewer and S. Ryan re North Contract	
313)	09/07/18	Email - Ryan to BAC re needed consent from North to provide North contract	Exhibit 003 of the North deposition (not produced by AMc or NRA)
314)	09/07/18	Chain of correspondence between S. Ryan and W. Brewer RE Update regarding Col. North	
315)	09/08/18	NRA Board Meeting Minutes	NRA-AMc_00077292

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
316)	09/09/18	Audit Committee Meeting Minutes	NRA-AMc 00069031-37
317)	09/11/18	Email - Winkler to Tavangar and Brandon Winkler re "NRA Accounting is holding payment for invoices 159388 and 160161 for reason that they require backup. These are OOP invoices for July and August." Bill Winkler asks "Who in accounting - important."	AMc-037255-037256
318)	09/11/18	Letter from J Madrid to W. Brewer re Your Letter of September 6, 2018	
319)	09/11/18	B. Winkler to W. Phillips regarding audit protocol	
320)	09/11/18	Article - Edwin Rios, Dear NRA: Putting KKK Hoods on Beloved Childhood Characters Probably Isn't the Best Strategy, Mother Jones	
321)	09/12/18	Ackerman Audit Schedule for Sep 17 and 18, 2018	AMc-059225 - AMc-059226
322)	09/12/18	W. Brewer letter to J. Madrid responding to September 11, 2018 letter re "building a case"	
323)	09/12/18	J. Frazer to G. Betts re Brewer team and document inspections	
324)	09/12/18	Article - Niraj Chokshi, N.R.A. Show Puts Thomas the Tank Engine in White Hood to Criticize Diversity Move, The New York Times	
325)	09/12/18	Article - Ryan W. Miller, Angry over diversity in children's show, NRA TV depicts 'Thomas & Friends' in KKK hoods, USA Today	
326)	09/13/18	Email - Makris to Hart re article in Washington Post re "Lawyer representing NRA is kicked out of Virginia federal case," noting "[s]o why is [W. Brewer] auditing us on Monday....?"	AMcTX-00035738-35739
327)	09/13/18	Email from Duane Reno to Lisa Supernaugh enclosing Vendor Letters	NRA-AMc 00068484
328)	09/13/18	Email - North to Cox, Hallow et al re the need of establishing "editorial guidance" after the Thomas the Tank incident.	NRA-AMc-00199018-199022
329)	09/13/18	J Frazer email to G. Betts Brewer team and document inspections	
330)	09/13/18	Cover Email from D. Reno to L. Supernaugh Attaching Form Vendor Letters & 50K	
331)	09/14/18	Article - Chloe Melas, NRA TV depicts 'Thomas & Friends' in KKK hoods, CNN	
332)	09/14/18	Article - Robert J. Spitzer, What's behind NRA TV's grotesque take on 'Thomas &Friends', CNN	
333)	09/14/18	Article - Danielle Cinone, 'Thomas & Friends' owner fires back after NRA show portrays characters in KKK hoods, New York Daily News	
334)	09/18/18	Email - Makris to Hart noting "Steve Ryan, our counsel, is expecting your call....call him about your 'audit'"	AMc-044303
335)	09/18/18	BAL Email to G Betts Copies of AMc records	
336)	09/19/18	G. Betts email to BAL re Copies of AMc Records	
337)	09/19/18	SBR to G. Betts NRA Ackerman Video Copying, Legal Fees	
338)	09/20/18	C. Barton obo G. Betts to SBR re NRA Ackerman Video Copying, Legal Fees	
339)	09/20/18	WAB to G. Betts, SBR re NRA Ackerman Video Copying, Legal Fees	
340)	09/21/18	Email - Revan to Angus and Makris re a call with Supernaugh et al. presumably about the Q3 2018 budget cuts. Revan notes that he "would like to reply to this copying Tony, Hart and North as additions to the call."	AMc-034756
341)	09/21/18	Email - Revan to Montgomery re budget adjustments noting that "[t]his entire thing needs to be forwarded to North after your convo or first thing Monday, whichever comes first"	AMc-058557-58558
342)	09/21/18	Email from L Supernaugh TO Bill Winkler, Brandon Winkler, M Montgomery, N Tavangar	
343)	09/24/18	Letter (draft) - Angus to WLP re budget adjustments	AMc-058564-58572 AMc-058859-58867
344)	09/24/18	Email from B Winkler to C Spray, L Supernaugh	
345)	09/25/18	L Supernaugh Email B Winkler	AMcTX-00000241
346)	09/26/18	Email - Montgomery to Sprangers and Holmes	AMcTX-00000796
347)	09/30/18	Email - Makris to Hart	AMc-034837-34840
348)	10/01/18	NRATV Powerpoint Presentation - NRATV YTD Q3'18: Analytics	AMcTX-00045846 / AMc-002772 / AMcTX-00042193
349)	10/02/18	Email - B. Winkler to C. Spray, J. Powell, L	AMc-037554
350)	10/03/18	NRATV YTD Q3'18: Analytics - Mass Media Approach and AM Approach - Jan. 1, 2018 to Oct. 3, 2018 - Presentation	AMc-002772-817
351)	10/04/18	Email - Montgomery to Bill Winkler, Cremer, Atterberry and Ackerman	AMc-057676-5677
352)	10/04/18	Email - W. Lapierre to W. Winkler	AMc-058611
353)	10/04/18	Letter - Powell to Bill Winkler re additional guidance on the enhanced invoice compliance requirements	NRA-AMc_00057377-57389
354)	10/04/18	Services Agreement, dated 4/30/2017 (Amended May 6, 2018)	NRA-AMc_00064218 - NRA-AMc 00064230 at 4218-4223
355)	10/05/18	Email - C. Spray to B. Winkler attaching letter	AMcTX-00000295-296
356)	10/05/18	Email - B. Winkler to C. Spray, J. Powell attaching letter	AMcTX-00000297-298
357)	10/06/18	Email - L. Supernaugh and B. Winkler	AM 00000912
358)	10/06/18	Email - Hart to Makris	AMc-034928
359)	10/06/18	Budget Adjustments	NRA-AMc_00064257 - NRA-AMc 00064258
360)	10/06/18	Email - C. Spray to B. Winkler attaching letter	NRA-Amc_00064257-58
361)	10/08/18	Email - SBR to Betts and Madrid re additional document requests (same email trail as 10/9/18 between Hart and Makris)	AMcTX-00010683
362)	10/08/18	D+D541:O547ycio & Biggs Invoice Dated October 8, 2018	NRA-DYCIO00000051 - 74
363)	10/09/18	NRATV 2018 YTD: Analytics Executive Overview - YTD Through October 9, 2018 - Presentation	AMc-002700-12
364)	10/09/18	Email - Hart to Makris re "38 years of historical practice could be a nice target for a NYAG"	AMcTX-00010643-10653 AMcTX-00010526-10530
365)	10/09/18	SBR, W. Brewer emails with G. Betts	NRA-AMc 00064263 - 68
366)	10/09/18	Video Copying, Legal Fees	NRA-AMc 00064269
367)	10/11/18	NRATV Powerpoint Presentation - NRATV YTD Q3'18: Analytics Executive Overview (updated)	AMcTX-00045804 / AMcTX-00042236 / AMc-002700
368)	10/11/18	Makris to Hart	
369)	10/16/18	Budget - 2018 and 2019 comparisons	AMcTX-00065376-65391 NRA-AMc 00185553-185568
370)	10/24/18	Email from Montgomery to Todd Grable	NRA-AMc 00045619
371)	10/24/18	Email chain between T. Grable and M. Montgomery	NRA-AMc 00045626-27
372)	10/24/18	North's Kitchen Cabinet Agenda for the 10/24/18 meeting	NRA-AMc 00057543-57545
373)	10/29/18	NRATV Powerpoint Presentation - NRATV NOIR YTD 2018 (slide)	AMcTX-00045965
374)	10/30/18	Invoices 161247 - 161616	NRA-AMc_00174417 - NRA-AMc 00174442
375)	11/05/18	Email - Montgomery to Spray	NRA-AMc-00045813-45817
376)	11/09/18	Email - N. Reaves and AMc executives	AMcTX-00036444
377)	11/09/18	Email - N. Reaves and AMc executives	AMcTX-00065148
378)	11/12/18	Email - N. Reaves and L. Cremer	AMcTX-00065319
379)	11/13/18	Excel spreadsheet of Carry Guard invoices	AMcTX-00065313
380)	11/16/18	Email - N. Reaves and B. Winkler and L. Cremer	AMcTX-00065308

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
381)	11/19/18	Email - Montgomery to Spray re finalization of budget	NRA-AMc_00045906
382)	11/19/18	Digital Extortion: Don't Let Your Data Be Held Hostage- Search Engine Journal	
383)	11/27/18	Ex A to Spofford Decl - Email from B. Floyd to G. Spofford	AMcTX-00062075
384)	11/27/18	Email - Floyd to Spofford re "mapping procedure ver 3"	AMcTX-00062075-62116
385)	11/29/18	Email - Makris to Hart forwarding email from Four Seasons Hotels and Resorts	AMc-044389
386)	11/29/18	Email - Van Horn to Montgomery	AMcTX-0006107-6108
387)	11/29/18	Invoices 161956 - 161960	NRA-AMc_00174391 - NRA-AMc_00174397
388)	11/30/18	Memorandum from W. LaPierre to the NRA Board of Directors	NRA-AMc_00160970-71
389)	12/04/18	2019 budget - revised	AMcTX-00043494
390)	12/05/18	Ex C to Spofford Decl - Email chain between A. Bilinski & J. Greenberg & G. Spofford	AMcTX-00059537
391)	12/06/18	Ex D to Spofford Decl - Email Chain between J. Greenberg; A. Bilinski & G. Spofford	AMcTX-00059567
392)	12/06/18	Invoices 160163 - 160250	NRA-AMc_00174253 - NRA-AMc_00174298
393)	12/06/18	Invoices 160218 - 160238	NRA-AMc_00185589 - NRA-AMc_00185598
394)	12/12/18	NRATV Powerpoint Presentation - NRATV 2018 YTD Analytics	AMcTX-00014872 / AMcTX-00014855
395)	12/14/18	Email - Makris to Hart	AMc-044411-44412
396)	12/14/18	Email - Makris to Hart	AMc-044420-44421
397)	12/19/18	Email from M. Erstling to C. Spray regarding payments held	NRA-AMc_00173148
398)	12/19/18	Invoices 160696-161996	NRA-AMc_00174160 - NRA-AMc_00174210
399)	12/19/18	Invoices 160472 -161902	NRA-AMc_00185519 - NRA-AMc_00185551
400)	12/21/18	Letter - SBR to Madrid	AMcTX-00011121-11122
401)	12/21/18	Request for Additional Materials	NRA-AMc_00068870 - NRA-AMc_00068871
402)	12/22/18	Email - Makris to Hart	AMcTX-00035850-35851
403)	12/27/18	Invoices 162568 - 162570	NRA-AMc_00174398 - NRA-AMc_00174409
404)	12/27/18	Invoices 162693 - 162570	NRA-AMc_00174410 - NRA-AMc_00174416
405)	12/29/18	Ex H to Spofford Decl - Daily NRATV Email Stats - 1/19/2018 - 12/28/2018	NRA-AMc_00083796
406)	12/29/18	Email - Automated email to Spofford, Floyd, Darley	NRA-AMc_00083796-83820
407)	12/31/18	Amendment No. 1 to North employment agreement	AMc-000077-88
408)	12/31/18	2018 AMc consolidated statement of income	AMcTX-00053183-53184
409)	12/31/18	2018 AMc financial statements (audited)	AMcTX-00068057-68073
410)	01/01/19	Daily NRA TV Email Stats - Jan 2019 - July 2019	NRA-AMc_00083828
411)	01/01/19	Summary of terms in North employment agreement	NRA-AMc_00199978
412)	01/03/19	Invoices 163404-163817	NRA-AMc_00068874 - NRA-AMc_00068887
413)	01/04/19	Letter - Madrid to Hart	NRA-AMc_00065378-65382
414)	01/04/19	Response to Brewer Letter of December 21, 2018	NRA-AMc_00173893 - NRA-AMc_00173897
415)	01/05/19	Email - Revan to Angus	AMc-058468
416)	01/05/19	NRA Board Meeting Minutes	NRA-AMc_00073923
417)	01/06/19	Audit Committee Meeting Report	BOD NRA-BK-00033846-50
418)	01/14/19	Invoices_163879-163888	AMc-039702 - AMc-039703
419)	01/14/19	Invoice 163888	NRA-AMc_00059964
420)	01/15/19	Email from P. Padilla to A. Onge	NRA-AMc_00068873 - NRA-AMc_00068887
421)	01/15/19	Invoice 163032	NRA-AMc_00174370 - NRA-AMc_00174372
422)	01/16/19	NRA Review of Records	NRA-AMc_00064316 - NRA-AMc_00064318
423)	01/18/19	NRATV Powerpoint Presentation - NRATV 2018 Metrics presentation	AMcTX-00045726 / AMcTX-00015697 / AMcTX-00015715 / AMcTX-00015625 / AMcTX-00016616 / AMc-040053
424)	01/18/19	Agreement for Forensic Accounting Services provided by FRA	NRA-AMc_00205167
425)	01/22/19	Email- Hart to Ryan	NRA-AMc_00113991
426)	01/24/19	Invoices 163406 - 163418	NRA-AMc_00161502 - NRA-AMc_00161518
427)	01/24/19	Invoices 163288-163290	NRA-AMc_00174455 - NRA-AMc_00174461
428)	01/24/19	Invoices 163293-163404	NRA-AMc_00174462 - NRA-Amc_00174464
429)	01/29/19	Agreement for Forensic Accounting Services provided by FRA	NRA-AMc_00205149-205166
430)	01/30/19	Frazer to Ryan re document request	NRA-AMc_0011434
431)	02/01/19	Email String Re: Qlik Reference Info	AMcTX-00064070-73
432)	02/01/19	Ex E to Spofford Decl - Email from C. Davis to A. Bilinski	AMcTX-00064080
433)	02/01/19	Invoice 164149	NRA-AMc_00078926
434)	02/03/19	Email - Email correspondence between Hart and Ryan; Frazer	AMcTX-00000400-404
435)	02/04/19	Email - Ackerman to Montgomery and Cremer	AMc-059450-59453
436)	02/04/19	Betts to Frazer re document request	AMcTX-00000573
437)	02/05/19	Ex F to Spofford Decl - Email from C. Davis to A. Bilinski	AMcTX-00064114
438)	02/06/19	Audit Committee Report	NRA-BK-00097682-83
439)	02/07/19	Email - Powers to Hakim (New York Times)	AMc-008729
440)	02/07/19	Email - Makris to Hart	AMc-035229-35232
441)	02/07/19	Ex G to Spofford Decl - Email from C. Davis to A. Bilinski	AMcTX-00064172
442)	02/11/19	Correspondence between J. Frazer and FRA records review	NRA-AMc_00115719 - NRA-AMc_00115721
443)	02/13/19	Invoices 164525-164607	NRA-AMc_00078964 - NRA-AMc_00078968
444)	02/19/19	North Conflicts Questionnaire	NRA-AMc_00175583
445)	02/21/19	Invoices 163635 - 163651	NRA-AMc_00091216 - NRA-AMc_00091238
446)	02/22/19	Email - from S. Rowling regarding Top Concerns for Audit Committee	NRA-AMc_00068915
447)	02/26/19	WLP letter to OLN	NRA-AMc_00064573
448)	03/01/19	Invoice 164866	AMc-040741
449)	03/01/19	Email - Van Horn to Spofford re NRATV views that "look extremely low"	AMcTX-00064445
450)	03/01/19	Email from E. Van Horn to G. Spofford regarding low views of NRATV videos as per Qlik Dashboard	AMcTX-00064445
451)	03/08/19	Audit Committee Report	NRA-BK-00098090-93
452)	03/11/19	Memo - Note describing Powers' conversation with Hakim (New York Times)	AMc-008730

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
453)	03/11/19	Email - Angus to Makris re NRATV New York Times story noting "I think this NYT reporter has revealed his source(s) for whatever is revealed in his story!"	AMc-035246-35247
454)	03/11/19	Rupal Parekh, “The NRA and Ackerman McQueen: One of the strongest relationships in AdLand,” AdAge, March 11, 2019	None (article)
455)	03/12/19	Letter - Madrid to Frazer re retention of BAC and allegation that the NRA leaked information to New York Times	AMcTX-00065364-65367
456)	03/12/19	FRA draft spreadsheet re Makris' OOP expenses	NRA AM FRA 0013868
457)	03/12/19	FRA draft spreadsheet re Schropp's OOP expenses	NRA AM FRA 0013869
458)	03/12/19	FRA draft spreadsheet re OOP expenses for various AMc executives	NRA AM FRA 0013870
459)	03/12/19	FRA draft spreadsheet re Tavangar's OOP expenses	NRA AM FRA 0013871
460)	03/12/19	FRA draft spreadsheet re budgets	NRA AM FRA 0013872
461)	03/12/19	FRA draft spreadsheet re AMc's media buys	NRA AM FRA 0013873
462)	03/14/19	Letter - Frazer to Madrid	AMc-035264-35265
463)	03/14/19	Invoice 163945	NRA-AMc 00078974
464)	03/14/19	Invoices 164878 - 164882	NRA-AMc_00079033 - NRA-AMc 00079035
465)	03/14/19	Invoices 164899 - 164905	NRA-AMc_00079036 - NRA-AMc 00079041
466)	03/15/19	Email - Makris to Revan	AMcTX-00035917-35918
467)	03/15/19	Email - Perrine to Tavangar	NRA-AMc 00085292
468)	03/16/19	Letter - Makris to W. Brewer	AMc-007792-7793
469)	03/21/19	Email - Makris to Hart	AMc-035277-35278
470)	03/21/19	Letter - Sullivan (counsel for North) and W. Brewer	OLN00208-209
471)	03/22/19	Letter - North, Childress and Meadows to W. Brewer	NRA-AMc 00069015-69016
472)	03/22/19	Email - D. Benedict to B. Godstreya	NRA-AMc_00119846 - NRA-AMc 00119849
473)	03/22/19	Excel Spreadsheet - NRATV registered users	NRA-AMc 00119850
474)	03/22/19	Email - D. Benedict to B. Godstreya	NRA-AMc_00119863 - NRA-AMc 00119866
475)	03/24/19	Email - Makris to Revan re Montgomery's response to Arulanandam's request for Dana Loesch's contract	AMc-035296-35297
476)	03/25/19	Document Inspection by Forensic Risk Alliance	NRA-AMc_00071193 - NRA-AMc 00071194
477)	03/28/19	Invoices 164469-164470	NRA-AMc_00078970 - NRA-AMc 00078971
478)	03/28/19	Invoices 164883 - 164888	NRA-AMc_00079043 - NRA-AMc 00079048
479)	03/29/19	Memo from O. North to WLP	NRA-AMc 00191401
480)	03/31/19	Letter - North to WLP re BAC billing	OLN00216-220
481)	04/01/19	Invoices 165588	AMc-041430
482)	04/01/19	Invoice 165580	AMc-041452
483)	04/07/19	NRATV 2019 Update - Jan 1 thru Apr 7 - Presentation	AMc-002844-52
484)	04/08/19	Email - Arulanandam to Montgomery and Revan re Request for NRATV data	AMcTX-00006137
485)	04/08/19	Letter - North to WLP re BAC	OLN00225-00228
486)	04/09/19	Email - Montgomery to Arulanandam	AMc-059494-59495
487)	04/09/19	Email from M. Montgomery to A. Arulanandam	NRA-AMc_00059407
488)	04/09/19	Letter - North to WLP re cancelled meeting and BAC billing	OLN00173
489)	04/10/19	Email - Montgomery to WLP	AMcTX-00000845
490)	04/10/19	Email thread between M. Montgomery & A. Arulanandam dated 4/10/2019;	NRA-AMc 00059409
491)	04/10/19	M. Montgomery email to A. Arulanandam	NRA-Amc 00176399
492)	04/11/19	Email - North to Frazer attaching the North contract and amendment to North contract, along with memo	OLN00230-247 NRA-AMc 00060542-60559
493)	04/15/19	Email - Powers to Revan and Angus re NRA lawsuit / AMc media statement	AMc-009673
494)	04/15/19	Statement from AMc - re NRA lawsuit	AMc-009692
495)	04/15/19	Email - Powers to Angus, Revan, Montgomery, Makris and Tavangar	AMcTX-00042029-42031
496)	04/15/19	Email - Boren to Bill Lance (Chickasaw)	NRA-AMc-00141141-141142
497)	04/15/19	Email - Murphy to Rendon re meeting with North	RENDONGROUP000023-26
498)	04/15/19	Statement from Ackerman McQueen	
499)	04/16/19	Letters from M. Dycio regarding Document Preservation, dated April 16 & 17, 2019	
500)	04/16/19	Hermes, Grant, “NRA Sues Oklahoma City Based Ad Firm Ackerman McQueen,” News9.com, April 16, 2019	None (article)
501)	04/17/19	Ex B to Spofford Decl - Email chain between G. Spofford & E. Horn & J. Greenberg	AMcTX-00059627
502)	04/17/19	Email - Spofford to Van Horn	AMcTX-00059627-59629
503)	04/17/19	Spies, Mike, “Secrecy, Self-Dealing, and Greed at the NRA,” New Yorker, April 17, 2019	None (article)
504)	04/19/19	NRATV Powerpoint Presentation - NRATV Q1 2019 Analytics	AMc-002640-2655
505)	04/22/19	Email Chain between W. Lapierre & M. Dycio dated April 22, 2019	NRA DYCIO00000464
506)	04/22/19	Letter - Winkler to WLP	NRA-AMc_00091615-91620 NRA-AMc_00069693-69697 AMc-035326
507)	04/22/19	Letter - Winkler to WLP	NRA-AMc_00091620-91624 NRA-AMc 00069701-69703
508)	04/24/19	Text - Boren to Hallow	DB 0265 (Boren 14)
509)	04/24/19	Email - Hallow to North	NRA-AMc_0061214
510)	04/25/19	Email - Boren to Anoatubby	DB 0245-249
511)	04/25/19	Text - Ed Martin to Boren	DB 0269
512)	04/25/19	Email - North to Frazer	NRA-AMc_00069192-69233 NRA-AMc_00064609-64650, OLN00134-136
513)	04/25/19	Invoices 165527 - 165552	NRA-AMc_00079051 - NRA-AMc 00079058
514)	04/25/19	Letter - WLP to Board members	NRA-AMc_00161960-161962 OLN00089-OLN91
515)	04/26/19	Email - Hart to Makris	AMc-035417-35419
516)	04/26/19	Invoices_165582-165587	NRA-AMc_00079068 - NRA-AMc 00079073
517)	04/26/19	Article - Danny Hakim, In N.R.A. Power Struggle, Insurgents Seek to Oust Wayne LaPierre, The New York Times	
518)	04/26/19	2019-04-26 Ferate to NRA counsel	
519)	04/27/19	Article - Mark Maremont, New York Attorney General Probes NRA as Oliver North Exits as President, The Wall Street Journal	
520)	04/28/19	Email - Cooper to Hart re article in New York Times "N.R.A. President to Step Down as New York Attorney General Investigates" by Danny Hakim	NRA-AMc_00185755-185758
521)	04/29/19	Millie Hallow's Email attaching notes from extortion call	NRA-AMc 00059595
522)	04/29/19	Millie Hallow's Extortion Notes Attachment	NRA-AMc 00059596-97
523)	04/29/19	NRA Board Meeting Minutes	NRA-AMc 00199814

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
524)	04/29/19	Audit Committee Report re Audited Financial Statements	NRA-BK-00068876-90
525)	04/29/19	Audit Committee Report to BOD	NRA-BK-00097942-55
526)	04/29/19	Article - Eli Watkins and Kate Sullivan, New York Attorney General investigating NRA finances amid group’s internal dispute, CNN	
527)	05/01/19	Invoice No. 166340 re "Talent Fee"	AMc-041863 AMc-042136
528)	05/01/19	Email - Brandon Winkler's approval of the cost re North's American Heroes shoot	AMc-058215
529)	05/01/19	Declaration - Bill Powers	NRA-AMc_00064991-00064992
530)	05/02/19	Incoice 165567	NRA-AMc_00079060
531)	05/02/19	Article - Mark Maremont, NRA Chief Wayne LaPierre Questioned on Travel Expenses, The Wall Street Journal	
532)	05/03/19	Kovensky, Josh, “WSJ: NRA Chief Asked About Bills for Expensive Suits, Overseas Travel, Talking Points Memo, May 3, 2019 (https://talkingpointsmemo.com/muckraker/wayne-lapierre-travel-expenses-nra).	
533)	05/05/19	Email from W. LaPierre to M. Hill at Ackerman, cc to A. Arulanandam (Offical Spokesperson)	
534)	05/06/19	Email - Arulanandam to Winkler re AMc Form Declarations to various AMc employees requesting them to affirm they did not leak information to media	NRA-AMc_00064986
535)	05/06/19	Letter - Arulanandam to Winkler re Recent Confidentiality Violations and Requested Affirmations	NRA-AMc_00064989-00064990
536)	05/07/19	D. Schertler email and letter to A. Arulanandam	NRA-Amc_00140631
537)	05/09/19	A. Arulanadam email to D. Schertler,	NRA-AMC_00059637 - 38
538)	05/09/19	American Heroes planned release schedule	AMcTX-00003938-3942
539)	05/09/19	Email - Email from Arulanandam to Montgomery and H. Martin	AMcTX-00042984
540)	05/09/19	2019-05-09 Email from AA to MM re NRATV	NRA-AMc_00059652
541)	05/09/19	Note (handwritten) - Grable to WLP re 2019 YTD monetization numbers ("not much activity")	NRA-AMc_00140551
542)	05/10/19	American Heroes Sponsorship Status	AMcTX-00003263
543)	05/10/19	NRATV Powerpoint Presentation - NRATV 2019 Update	AMcTX-00020114 / AMc-041806
544)	05/10/19	2019-05-10 Email from MM to AA re Analytics	NRA-AMc_00086579
545)	05/10/19	Audit Committee Report	NRA-BK-00098441
546)	05/10/19	[FW: Final Materials] [NRATV-AnalyticsDeck-051019-RV16.pdf] NRATV 2019 Update for the period Jan 1 - May 1	
547)	05/11/19	Maremont, Mark, “Leaked Letters Reveal Details of NRA Chief’s Alleged Spending, Wall Street Journal, May 11, 2019 (https://www.wsj.com/articles/leaked-letters-reveal-details-of-nra-chiefs-alleged-spending-11557597601).	None (article)
548)	05/11/19	Brigham, Bob, “BUSTED: National Rifle Association caught spending \$275,000 at Beverly Hills boutique – on suits for Wayne LaPierre,” rawstory.com, May 11, 2019 ((https://www.rawstory.com/2019/05/busted-national-rifle-association-caught-spending-275000-at-beverly-hills-boutique-on-suits-for-wayne-lapierre/).	None (article)
549)	05/11/19	Article - Mark Maremont, Leaked Letters Reveal Details of NRA Chief’s Alleged Spending, The Wall Street Journal	
550)	05/11/19	Maremont, Mark, “Leaked Letters Reveal Details of NRA Chief’s Alleged Spending,”	
551)	05/12/19	Richardson, John, “Ack-Mac Letter Regarding LaPierre Expenses,” Onlygunsandmoney.com, May 12, 2019 (https://onlygunsandmoney.com/2019/05/12/ack-mac-letter-regarding-lapierre.html).	None (article)
552)	05/13/19	Email - Hakim (New York Times) to Powers	AMc-010950
553)	05/13/19	Letter Package - Montgomery to Arulanandam	AMcTX-00003309 (letter) AMcTX-00003282-3308 (NRA TV 2019 Update) AMcTX-00003262-3281 (NRATV 2018 Media Valuation)
554)	05/13/19	AMc Letter	AMcTX-00003970
555)	05/13/19	Email - H. Martin to Van Horn	AMcTX-00048657
556)	05/13/19	Email - H. Martin to Van Horn	AMcTX-00048659
557)	05/13/19	Puckett, Lily, “Wayne LaPierre spent hundreds of thousands from NRA funds on suits and travel, leaked documents show,” Independent, May 13, 2019 (https://www.independent.co.uk/news/world/americas/nra-leaked-documents-wayne-lapierre-suit-travel-expenses-a8910771.html).	
558)	05/13/19	Wolf, Cam, “The CEO of the NRA Spent Almost \$300,000 on Suits,” GQ, May 13, 2019 (https://www.gq.com/story/nra-ceo-wayne-lapierre-suits).	
559)	05/13/19	Kutsch, Tom, “Read the Leaked NRA Docs that Detail Wayne LaPierre’s Lavish Spending,” The Trace, May 13, 2019 (https://www.thetrace.org/newsletter/leaked-nra-documents-wayne-lapierre-lavish-spending/).	
560)	05/13/19	Madden May, Pete, “NRA infighting spills into public view with anonymous leak of documents,” abcnews.go.com, May 13, 2019 (https://abcnews.go.com/Politics/nra-infighting-spills-public-view-anonymous-leak-documents/story?id=63012618).	
561)	05/13/19	Silverstein, Ken, “Exclusive: Did the head of the NRA have an intimate relationship with a Russian spy and have his group pay her apartment rent,” WashingtonBabylon.com, May 13, 2019 (https://washingtonbabylon.com/exclusive-did-the-head-of-the-nra-have-an-intimate-relationship-with-a-russian-spy-and-have-his-group-pay-her-apartment-rent/).	
562)	05/13/19	Silverstein, Ken, “Exclusive: Did the head of the NRA have an intimate relationship with a Russian spy and have his group pay her apartment rent?”, May 13, 2019 (https://washingtonbabylon.com/exclusive-did-the-head-of-the-nra-have-an-intimate-relationshipwith-a-russian-spy-and-have-his-group-pay-her-apartment-rent/).	
563)	05/13/19	DTwyan (@dtwyman), Twitter (May 13, 2019) (photo of Ms. Allen on a pink flamingo in a pool).	
564)	05/14/19	Email - Powers to Hakim (New York Times) saying "Hang in there and I promise you'll get more than an emailed statement."	AMc-009682
565)	05/14/19	Email - Revan forwards 5/13/19 email from Hakim to Angus	AMcTX-00003310
566)	05/14/19	Christensen, Dan, “NRA pays lobbyist Marion Hammer big bucks, but you won’t find that disclosed in Tallahassee,” Floridabulldog.org, May 14, 2019 (https://www.floridabulldog.org/2020/07/nra-lobbyist-marion-hammer-to-face-ethics-commission-hearing/).	None (article)
567)	05/14/19	Hakim, Danny, “At the N.R.A., a Cash Machine Sputtering,” New York Times, May 14, 2019 (https://www.nytimes.com/2019/05/14/us/nra-finance-executives-board-members.html).	None (article)
568)	05/14/19	D. Schertler sends an email to A. Arulanandam, cc J. Frazer, D. Onorato; D. Dickieson with attached letter re providing data to NYT	

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
569)	05/14/19	Hakim, Danny, "At the N.R.A., a Cash Machine Sputtering," New York Times, May 14, 2019 (https://www.wsj.com/articles/leaked-letters-reveal-details-of-nra-chiefsalleged-spending-11557597601).	
570)	05/17/19	Dickinson, Tim., "Leaked Documents Reveal 'Mindboggling' Spending at the National Rifle Association, Rolling Stone, May 17, 2019 (https://www.rollingstone.com/politics/politics-features/mindboggling-spending-at-the-national-rifle-association-836980/).	None (article)
571)	05/17/19	Dickinson, Tim., "Leaked Documents Reveal 'Mindboggling' Spending at the National Rifle Association, Rolling Stone, May 17, 2019 (https://www.rollingstone.com/politics/politics-features/mindboggling-spending-at-the-national-rifle-association-836980/).	None (article)
572)	05/20/19	Email - Arulanandam to Montgomery and H. Martin	AMcTX-00042580
573)	05/20/19	Blog regarding AMc now leaking embarrassing information about W. LaPierre	NRA-AMc 00140807
574)	05/21/19	Invoices AMc billed to NRA in 2015-2016 and 2018: Sixteen (16) Paid Invoices totaling \$22,356,171 relating to media buys (Invoice Nos. 130885, 133360, 133361, 133660, 133661, 133715, 134776, 135117, 135119, 136353, 137286, 137955, 137956, 141002, 156955 and 157106)	NRA-AMc_00140814
575)	05/22/19	Affidavit of Travis Carter, as filed in Civil Case No. CL19001757, in the Circuit Court for the City of Alexandria, Virginia	
576)	05/23/19	NRA's Emergency Motion for Stay, filed in VA	CL1900177
577)	05/23/19	Swan, Betsy, "NRA Sues Advertising Firm for Alleged Media Leaks, Coup Attempt, Daily Beast, May 23, 2019 (https://www.thedailybeast.com/nra-sues-advertising-firm-ackerman-mcqueen-for-alleged-media-leaks-coup-attempt).	None (article)
578)	05/23/19	Hakim, Danny and Montague, Zach, "Ad Firm Fires Back at N.R.A. With \$50 Million Lawsuit," New York Times, May 23, 2019 (https://www.nytimes.com/2019/05/23/us/nra-ackerman-mcqueen-lawsuit.html).	None (article)
579)	05/23/19	Swan, Betsy, "NRA Sues Advertising Firm for Alleged Media Leaks, Coup Attempt, Daily Beast, May 23, 2019 (https://www.thedailybeast.com/nra-sues-advertising-firm-ackerman-mcqueen-for-alleged-media-leaks-coup-attempt).	None (article)
580)	05/23/19	Hakim, Danny and Montague, Zach, "Ad Firm Fires Back at N.R.A. With \$50 Million Lawsuit," New York Times, May 23, 2019 (https://www.nytimes.com/2019/05/23/us/nra-ackerman-mcqueen-lawsuit.html).	None (article)
581)	05/24/19	Email - Arulanandam to Montgomery	AMc-058489
582)	05/29/19	Weinberg, Neil and Voreacos, David, "Ad Firm Cuts Ties with NRA, Says 'Chaos Led Us to Lose Faith' After 38 Years," Bloomberg, May 29, 2019 (https://www.bloomberg.com/news/articles/2019-05-29/nra-s-longtime-ad-agency-severs-ties-as-legal-battle-escalates).	None (article)
583)	05/29/19	Email - Montgomery letter to Arulanandam alleging that "[t]he NRA has, in essence, constructively terminated the Services Agreement."	NRA-AMc_00059931
584)	05/29/19	R. McQueen email to A. Arulanandam, cc C. Spray, J.Frazer, W. LaPierre	NRA-AMc 00180311-180315
585)	05/29/19	A. Arulanandum letter to R. McQueen	NRA-AMc 00180347
586)	05/29/19	Statement from Ackerman McQueen	
587)	05/30/19	Audit Committee resolution rescinding approval on North Contract	AMc-022072-22073 NRA-AMc 00069739-69740
588)	05/30/19	Audit Committee Report Draft	NRA-AMc 00071202-05
589)	05/30/19	M. Montgomery email to A. Arulanandam	
590)	05/31/19	Arulanandam email to Montgomery re NRATV	NRA-AMc 00059956-57
591)	06/01/19	Invoice No. 167038 re "Talent Fee"	AMc-042052
592)	06/03/19	B. Winkler email to C. Spray, cc W. LaPierre, A. Arulanandam and J. Frazer	NRA-Amc 00180783-85
593)	06/03/19	Declaration - Powers dated 06/03/19	
594)	06/04/19	D. Schertler email to J. Frazer, cc to NRA and Ackerman Staff	NRA-Amc 00180828-31
595)	06/05/19	A. Arulanandam email and letter to B. Winkler	NRA-Amc 00180873-78
596)	06/11/19	Letter - Arulanandam to Montgomery re AMc invoices and wind-down	NRA-AMc 00060122-60123
597)	06/13/19	Memo (draft) - Analysis of the 2018 NRA Consolidated Financial Statement	NRA-AMc_00071065-710077 NRA-AMc_00069887-00069999
598)	06/14/19	Letter from A. Arulanandam to D. Scertler	
599)	06/17/19	A. Arulanandam email to M. Montgomery with cc to A. McQueen, R. McQueen and D. Schertler	NRA-AMc-00070032
600)	06/17/19	Letter - W. Brewer to Frazer re Amendment to Engagement Letter Dated March 5, 2018	NRA-BK-00060639-60647
601)	06/18/19	D. Schertler email to A. Arulanandam, M. Montgomery, cc A. McQueen and R. McQueen	NRA-AMc-00070036
602)	06/18/19	A. Arulanandam email to D. Schertler and M. Montgomery; cc to A. McQueen and R. McQueen	NRA-AMc-00070049
603)	06/18/19	D. Schertler email to A. Arulanandam, M. Montgomery,, cc A. McQueen and R. McQueen	NRA-AMc-00070054
604)	06/25/19	Article - Danny Hakim, NRA Shuts Down Production of NRATV, The New York Times	
605)	06/26/19	Statement-From-Ackerman-McQueen	
606)	06/28/19	Deposition Transcript - Robert Pincus, on 06/28/2019 (VA)	
607)	06/30/19	AMc Weekly Time Sheets of Caile Turner from Jan 2018 thru June 2019 (Project/Campaign redacted from certain billings)	AMc 047065 - AMc 047144 at 7075
608)	06/30/19	Weekly Time Sheet of Clay Turner from Jan 2018 thru Jun 2019	AMc 047791 - AMc 047868
609)	06/30/19	AMc Weekly Time Sheets of Eric Van Horn from Jan 2018 thru June 2019	AMc 049136 - AMc 049212
610)	06/30/19	AMc Weekly Time Sheets of Michael Ives from Jan 2018 thru June 2019	AMc 053074 - AMc 053150
611)	06/30/19	AMc Weekly Time Sheets of Patrick Kobler from Jan 2018 thru June 2019	AMc 053812 - AMc 053889
612)	07/03/19	Statement from Ackerman McQueen	
613)	07/08/19	Daily NRA TV Email Stats - Jan 2018 - Dec 2018	NRA-AMc 00127208
614)	07/08/19	Deposition transcript - Anthony Ferate on 07/08/19 (VA)	
615)	07/15/19	Deposition Transcript - John Popp, on 07/15/2019 (VA)	
616)	08/30/19	AMc produced daily time records for 2018 that includes "NR, NRAF, NRZ, and NI Hours"	AMc 001476 - AMc 002426
617)	08/30/19	Statement from Ackerman McQueen	
618)	08/30/19	Plaintiff's Original Complaint, ECF 1	
619)	09/13/19	Statement from AMc	
620)	09/13/19	Statement from Ackerman McQueen	
621)	09/14/19	NRA Board Meeting Minutes	
622)	09/18/19	Deposition transcript - Michael Trahar on 09/18/19 (VA)	
623)	09/24/19	Deposition transcript - Wayne LaPierre on 09/24/19 (VA)	
624)	09/26/19	Deposition Transcript - Ron Carter, on 09/26/2019 (VA)	
625)	09/27/19	Production Invoice No. 169859	AMcTX-00044273-91
626)	09/27/19	Letter - Montgomery to Arulanandam	AMcTX-00044292-45352
627)	09/30/19	Letter from D. Dickieson to M Collins	
628)	10/01/19	Email - R. Charnley to B. Brewer	
629)	10/01/19	Defendant Ackerman McQueen, Inc.'s Original Answer, Counterclaim, and Third Party Complaint against Wayne LaPierre, ECF 12	
630)	10/01/19	AMc's Motion to Compel the Production of Documents from Third-Party FRA, filed in the VA matter, Case Nos. CL19001757, CL19002067, and CL19002886 (Cir. Ct. Va. 2019)	
631)	10/02/19	Deposition Transcript - Andrew Arulanandam, on 10/02/2019 (VA)	
632)	10/03/19	Deposition transcript - Craig Spray on 10/03/19 (VA)	

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
633)	10/23/19	The NRA and Ackerman McQueen_ One of the Strongest Relationships in Adland _ AdAge	
634)	10/25/19	Plaintiff's First Amended Complaint, ECF 18	
635)	10/25/19	Plaintiff the National Rifle Association of America's Answer to Defendant Ackerman McQueen, Inc.'s Counterclaim, ECF 17	
636)	10/28/19	Statement from Ackerman McQueen	
637)	10/29/19	Statement from Ackerman McQueen	
638)	11/05/19	NRA's First Set of Requests for Production	
639)	11/08/19	NRA's Memorandum of Law in Opposition to AMc's Motion to Compel Production of Documents from Third-Party FRA, dated 11/8/19, filed in the VA matter	
640)	11/13/19	Declaration of John Frazer	
641)	11/13/19	Hearing transcript - National Rifle Association of America v. Ackerman McQueen, Inc. et al., Cons. Case Nos. CL19001747, CL19002067, CL19002886 (Cir. Ct. Va. 2019), on 11/13/19	
642)	11/15/19	Defendants' Amended Answer and Defendant/Counter-Plaintiff Ackerman McQueen, Inc.'s Amended Counterclaim and Third-Party Complaint, ECF 31	
643)	12/10/19	Declaration of G. Stinchfield dated December 10, 2019	
644)	12/18/19	Deposition transcript - Oliver North on 12/18/19 (VA)	
645)	12/23/19	Plaintiff National Rifle Association of America's Answer to Defendant Ackerman McQueen, Inc.'s Amended Counterclaim, ECF 41	
646)	12/28/19	Statement from Ackerman McQueen	
647)	12/28/19	AMc Statement, Dec. 28, 2019, The Oklahoman – “Will NRA Get Insider Info.”	
648)	12/31/19	2019 AMc consolidated statement of income	AMcTX00053204-53105
649)	12/31/19	2019 AMc's redacted record of "Inside Labor Cost," "Labor Hours," "Overhead Allocation," and "Misc Direct and T&E Total" for the NRA and all AMc clients	AMcTX-00053206-53115
650)	12/31/19	2019 AMc financial statements (audited)	AMcTX-00068074-68092
651)	01/10/20	Deposition transcript - Millie Hallow on 01/10/20 (VA)	
652)	01/16/20	Deposition transcript - John Frazer on 01/16/20 (VA)	
653)	01/29/20	Deposition transcript - Carolyn Meadows on 01/29/20 (VA)	
654)	01/29/20	NRA's Fourth Set of Requests for Production	
655)	02/03/20	NRA's Second Set of RFP	
656)	02/03/20	NRA's Second Set of Requests for Production	
657)	02/04/20	Deposition Transcript - Steven Hart on 02/04/20 (VA)	
658)	02/07/20	Deposition Transcript - Charles Cotton, on 02/07/2020 (VA)	
659)	02/11/20	Email response to subpoena directed to Workamajig	n/a
660)	02/21/20	AMc's Responses and Objections to NRA Fourth Set of RFP's in VA	
661)	02/24/20	Statment from Ackerman McQueen - Wall Street Journal	
662)	03/04/20	Letter - Frazer to Betts	NRA-AMc 00199046-199047
663)	03/04/20	ECF 122 at Ex. 36, Declaration of Travis Carter [Appendix 184-186].	
664)	03/26/20	AMc's Responses and Objections to NRA Second Set of RFP's	
665)	03/26/20	NRA's Revised Second Set of RFP	
666)	03/26/20	Defendants' Objections and Responses to Plaintiffs's Second Set of Requests for Production	
667)	03/30/20	Declaration - McQueen Revan	
668)	04/14/20	Declaration of Andrew Arulanandam	
669)	04/29/20	Declaration of Michael Erstling	
670)	04/30/20	Declaration of G. Stinchfield dated April 30, 2020	
671)	05/01/20	Declaration of John Frazer	
672)	05/04/20	Declaration - Spray dated 05/04/20	
673)	05/06/20	An essential marketing tool in a downturn: Spend management by McKinsey & Company	
674)	05/28/20	Letter - Childress to NRA Hearing Board re coup / North	No bates, LtCol North Submission 112, 116, 120
675)	06/03/20	Declaration - Makris	
676)	06/17/20	Deposition transcript - Wayne LaPierre on 06/17/20 (NYAG)	
677)	06/25/20	Bergin's affidavit in the Ultra Petroleum Corp. case	
678)	08/06/20	NYAG v. NRA Complaint, ECF 448-5	
679)	08/06/20	NYAG v. NRA Complaint, ECF 448-5	
680)	08/07/20	Declaration of Susan Dillon	
681)	08/11/20	NRA's Amended Complaint against North, ECF 18, filed in NY	
682)	08/21/20	NRATV Analytics, pulled on 08/21/20	AMcTX-00003158
683)	08/21/20	Court Order in re Ultra Petroleum Corp.	
684)	08/24/20	Memorandum Of Law In Opposition To The Attorney General’s Special Proceeding And Application To Compel Respondent Ackerman McQueen To Comply With An Investigatory Subpoena NYSCEF DOC. NO. 25 Index # 451825/2019	
685)	08/31/20	North's Answer to Amended Complaint (NRA vs. North), ECF 41, filed in NY	
686)	09/03/20	Marketing Metrics, The Manager's Guide to Measuring Marketing Performance, Fourth Edition by Neil T. Bendle, Paul W. Farris, Phillip E. Pfeifer, and David J. Reibstein	
687)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 85 (2020).	
688)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 193 (2020).	
689)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 91 (2020).	
690)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 98 (2020).	
691)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 96 (2020).	
692)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 101 (2020).	
693)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 102 (2020).	
694)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 91 (2020).	
695)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 92 (2020).	
696)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 165 (2020).	
697)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 183 (2020).	
698)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 185 (2020).	
699)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 187 (2020).	
700)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 232 (2020).	

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
701)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 198 (2020).	
702)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 199 (2020).	
703)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 201 (2020).	
704)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 205 (2020).	
705)	09/07/20	Joshua L. Powell, Inside the NRA: A Tell-all Account Of Corruption, Greed, And Paranoia Within the Most Powerful Political Group in America, 216 (2020).	
706)	10/09/20	Email - Alexander (Williams & Connoll LLP) to SME re North's compensation in 2019	
707)	11/03/20	Deposition transcript - Dan Boren on 11/03/20 (TX)	
708)	12/09/20	AMc's Privilege Log	
709)	12/15/20	Email - Kelsey (Dorsey) to BAC re privilege log which is attached	
710)	01/06/21	AMc's Supplemental Categorical Privilege Log	
711)	02/24/21	AMc's stockholder listing	BANA AMI000292
712)	03/12/21	NRA's Second Amended Complaint, ECF 209, filed in TX	
713)	03/12/21	NRA's Second Amended Complaint, ECF 209, filed in TX	
714)	03/14/21	Email - Claudia Colon Garcia-Moliner to B. Mason regarding NRATV Social Media Account log in credentials	NRA-AMc_00185706
715)	03/15/21	Deposition Transcript - John Frazer 30(b)(6) on 03/15/2021 (CH 11)	
716)	03/18/21	Deposition transcript - John Frazer on 03/18/21 (CH 11)	
717)	03/18/21	Deposition Transcript - Hon. Phillip Journey on 03/18/2021 (CH 11)	
718)	03/19/21	Deposition Transcript - Wilson Phillips, on 03/19/2021 (CH 11)	
719)	03/19/21	Deposition Transcript - Sonya Rowling, Individual and 30(b)(6), on 03/19/2021 (CH 11)	
720)	03/22/21	Deposition Transcript - Wayne LaPierre, Individual and 30(b)(6) on 03/22/2021 (CH 11)	
721)	03/23/21	Deposition transcript - Wayne LaPierre on 03/23/21 (CH 11)	
722)	03/23/21	Deposition Transcript - William Wang 30(b)(6) on 03/23/2021 (CH 11)	
723)	03/24/21	Deposition Transcript - Tony Makris, on 03/24/2021 (CH 11)	
724)	03/24/21	Deposition Transcript - Craig Spray, on 03/24/2021 (CH 11)	
725)	03/25/21	Deposition transcript - Gayle Stanford on 03/25/21 (CH 11)	
726)	03/26/21	Deposition transcript - Bill Winkler (30b6) on 03/26/21 (CH 11)	
727)	03/26/21	Deposition Transcript - Bill Winker (Fact) on 03/26/2021 (CH 11)	
728)	03/26/21	Deposition Transcript - William Winkler, dated 03/26/2021 (CH 11), at 107:10-108:9	
729)	03/27/21	Deposition Transcript - Charles Cotton, on 03/27/2021 (CH 11)	
730)	03/28/21	Deposition Transcript - Charles Cotton, on 03/28/2021 (CH 11)	
731)	03/31/21	Deposition transcript - Melanie Montgomery (30b6) on 03/31/21 (VA)	
732)	04/08/21	Hearing Transcript - Amended Transcript of Motion to Dismiss Case (CH 11) - 04/08/21 PM session	
733)	04/08/21	Letter- A. Allegretto to B. Mason	
734)	04/16/21	Hearing transcript - Chapter 11 on 04/16/21 AM session (CH 11 trial)	
735)	04/16/21	Hearing transcript - In Re: National Rifle Association of America and Sea Girt, LLC, Case No. 21-30085 (N.D. Tex. 2021), on 04/16/21 (PM session)	
736)	04/20/21	Hearing Transcript - Amended Transcript of Motion to Dismiss Case (CH 11) - 04/20/21 AM session	
737)	04/21/21	Hearing transcript - Chapter 11 on 04/21/21 PM session (CH 11 trial)	
738)	04/21/21	Hearing transcript - Michael Erstling on 04/21/21 (CH 11 trial)	
739)	04/23/21	Declaration of G. Stinchfield dated April 23, 2021	
740)	05/11/21	Bankruptcy Court Order	
741)	05/17/21	Defendants' Answer to Plaintiff's Second Amended Complaint	
742)	05/22/21	Counter-Plaintiff Ackerman McQueen, Inc.'s Second Amended Counterclaim, ECF 241	
743)	05/22/21	Counter-Plaintiff Ackerman McQueen, Inc.'s Second Amended Counterclaim	
744)	06/01/21	Goolsby - Expert Report	
745)	06/01/21	Hochman - Expert Report	
746)	06/01/21	Expert Report - Mclean	
747)	06/15/21	Jackson - Expert Report	
748)	06/15/21	Expert Report - Klink	
749)	06/21/21	NRATV Analytics, pulled on 06/21/21	AMcTX-00047766
750)	06/27/21	NRATV Analytics, pulled on 06/27/21	AMcTX-00061114
751)	07/01/21	Bergin - Expert Rebuttal Report	
752)	07/01/21	Jackson - Expert Rebuttal Report	
753)	07/06/21	Declaration of Brian Mason	
754)	07/15/21	Kanter - Expert Rebuttal Report	
755)	07/15/21	Kraus - Expert Rebuttal Report	
756)	07/26/21	Deposition transcript - Steven Hart on 07/26/21 (TX)	
757)	07/27/21	Deposition transcript - Christopher Cox on 07/27/21 (TX)	
758)	07/28/21	Deposition transcript - Susan Dillon on 07/28/21 (TX)	
759)	07/30/21	Deposition transcript - Brandon Winkler on 07/30/21 (TX)	
760)	07/31/21	Letter - Brian E. Mason to Sarah Rogers, Philip J. Furia and Jason Clouser	
761)	08/02/21	Declaration of Todd Grable	
762)	08/02/21	Deposition transcript - Andrew Arulanandam 30(b)(6) on 08/02/21 (TX)	
763)	08/02/21	Deposition transcript - John Frazer 30(b)(6) on 08/02/21 (TX)	
764)	08/02/21	Deposition transcript - Bill Powers on 08/02/21 (TX)	
765)	08/03/21	Letter - Philip J. Furia to Brian E. Mason	
766)	08/03/21	Declaration of Charles Cotton with Exhibits	
767)	08/03/21	Declaration of John Frazer with Exhibits	
768)	08/04/21	Deposition of Melanie Montgomery	N/A
769)	08/04/21	Deposition transcript AMc 30(b)(6) (Bill Winkler, Melanie Montgomery and Brian Darley) on 08/04/21 (TX)	
770)	08/04/21	Deposition transcript - Nader Tavangar on 08/04/21 (TX)	
771)	08/05/21	Deposition transcript - Lacey Cremer (Duffy) on 08/05/21 (TX)	
772)	08/05/21	Deposition transcript - Tony Makris on 08/05/21 (TX)	
773)	08/05/21	Deposition transcript - Ed Martin on 08/05/21 (TX)	
774)	08/06/21	Letter - Philip J. Furia to Brian E. Mason	
775)	08/06/21	Deposition transcript - Melanie Montgomery on 08/06/21 (TX)	
776)	08/10/21	Deposition transcript - Jonathan Hochman on 08/10/21 (TX)	
777)	08/10/21	Deposition transcript - Hochman on 08/10/21	
778)	08/11/21	Deposition transcript - Skye Brewer on 08/11/21 (TX)	
779)	08/12/21	Deposition transcript - Larry Kanter on 08/12/21 (TX)	
780)	08/13/21	Deposition Transcript - Matthew Klink, on 08/13/2021 (TX)	
781)	08/15/21	Email - SBR to Mason re Experts / Scheduling	
782)	08/16/21	Email from B. Mason to P. Furia regarding NRATV overhead / costs	
783)	08/16/21	Goolsby - Supplemental Expert Report	
784)	08/17/21	Letter - Jason Clouser to Brian E. Mason re Privilege Log	
785)	08/17/21	Deposition transcript - Gary Goolsby on 08/17/21 (TX)	

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
786)	08/18/21	Publication - Vanity Metrics: Definition, How To Identify Them, And Examples, Tableau website	
787)	08/18/21	Publication - Vanity Metrics: Definition, How To Identify Them, And Examples, Tableau website	
788)	08/19/21	Deposition transcript - John Frazer on 08/19/21 (TX)	
789)	08/19/21	Deposition transcript - Autumn Kraus on 08/19/21 (TX)	
790)	08/20/21	Deposition transcript - Richard Bergin on 08/20/21 (TX)	
791)	08/20/21	Deposition transcript - Wayne LaPierre on 08/20/21 (TX)	
792)	08/20/21	2020 AMc Tax Return	
793)	08/23/21	Email - Carroll to SBR, PJF, SME and JFC	
794)	08/23/21	Deposition transcript - Revan McQueen on 08/23/21 (TX)	
795)	08/24/21	Email - SBR to Carroll, PJF, SME and JFC	
796)	08/25/21	Letter - Sarah B. Rogers to Brian E. Mason	
797)	08/25/21	Letter - Sarah B. Rogers to Brian E. Mason re "Highly Confidential" Designations	
798)	08/26/21	Email - Cady to Mason, SBR and PJF h	
799)	08/27/21	Deposition transcript - Andrew Arulanandam 30(b)(6) on 08/27/21 (TX)	
800)	08/27/21	Deposition transcript - Michael Erstling 30(b)(6) on 08/27/21 (TX)	
801)	08/30/21	Deposition transcript - John Frazer on 08/30/21 (TX)	
802)	08/30/21	Deposition transcript - Wilson Phillips on 08/30/21 (TX)	
803)	08/30/21	Counter-Defendant National Rifle Association of America's Answer to Counter-Plaintiff Ackerman McQueen, Inc.'s Second Amended Counterclaim, ECF 340	
804)	08/31/21	Declaration - Meadows dated 08/31/21	
805)	08/31/21	Deposition transcript - Rick Tedrick on 08/31/21 (TX)	
806)	08/31/21	NRA's Status Report on Outstanding Discovery Issues, ECF 342	
807)	08/31/21	AMc's Status Report dated August 31, 2021	
808)	08/31/21	AMc's Status Report dated August 31, 2021	
809)	09/01/21	Letter - Brian E. Mason to Sarah B. Rogers ("PIP Dashboard Access Letter")	
810)	09/01/21	Declaration of Brian Buss	
811)	09/01/21	Declaration of Jason Clouser With Exhibits	
812)	09/01/21	Declaration of John Frazer	
813)	09/01/21	Declaration of John Frazer	
814)	09/01/21	Declaration of Todd Grable (Corrected Version with Exhibits)	
815)	09/01/21	Declaration - LaPierre	
816)	09/01/21	Declaration - Arulandanam	
817)	09/01/21	Letter - Brian E. Mason to Sarah B. Rogers ("PIP Dashboard Access Letter")	
818)	09/03/21	Letter - Cecelia L. Fanelli to Brian E. Mason re PIP Dashboard, Server, and NRATV Social Media Login Credentials	
819)	09/03/21	NRA's Supplemental Status Report Letter to Judge Fish, ECF 354	
820)	09/03/21	U.S. District Court for the Western District of Oklahoma Order to Transfer AMc's Motions to Quash long-outstanding third-party subpoenas by the NRA to a former AMc employee, Tamara Payne, and to AMc's auditors at HBC, to the U.S. District Court, Northern District of Texas (Dallas), ECF 355	
821)	09/08/21	Email - Werbner to PJF re Phillips deposition	
822)	09/09/21	Letter - Cecelia L. Fanelli to Brian E. Mason re NRA Dashboard, Server, and NRATV Social Media Login Credentials	
823)	09/09/21	Letter - Cecelia L. Fanelli to Brian E. Mason re NRA Dashboard, Server, and NRATV Social Media Login Credentials	
824)	09/10/21	Letter from B. Mason to J. Clouser and S. Rogers dated September 10, 2021	
825)	09/10/21	Letter - Brian E. Mason to Jason Clouser re Privilege Log	
826)	09/12/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard	
827)	09/12/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard	
828)	09/14/21	Letter - Cecelia L. Fanelli to Brian E. Mason re NRA Dashboard, Server, and NRATV Social Media Login Credentials	
829)	09/14/21	Letter - Cecelia L. Fanelli to Brian E. Mason re NRA Dashboard, Server, and NRATV Social Media Login Credentials	
830)	09/15/21	Oliver North Depo. Memorandum	NRA-BK-00177963-00177967
831)	09/15/21	Deposition transcript - Oliver North on 09/15/21 (TX)	
832)	09/16/21	Hearing transcript - Status Conference re outstanding discovery on 09/16/21	
833)	09/17/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Server, NRATV Social Media Accounts Login Credentials, and Goolsby Deposition	
834)	09/17/21	Letter - Cecelia L. Fanelli to Martin C. Geagan (Winston & Strawn LLP)	
835)	09/17/21	Letter - Philip J. Furia to Mark Werbner re Phillips deposition	
836)	09/17/21	Letter - Brian E. Mason to Sarah B. Rogers re Privilege Log	
837)	09/17/21	NRA's Weekly Status Report, ECF 365	
838)	09/17/21	AMc's First Amended Privilege Log	
839)	09/21/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard	
840)	09/21/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Goolsby Deposition and Proposal for Forensic Neutral	
841)	09/21/21	AMc's First Amended Privilege Log	
842)	09/21/21	Letter - Brian E. Mason to Cecelia L. Fanelli	
843)	09/22/21	Letter - Sarah B. Rogers to Brian E. Mason	
844)	09/23/21	Letter - Sarah B. Rogers to Brian E. Mason re correspondence	
845)	09/23/21	Letter - Cecelia L. Fanelli to Brian E. Mason	
846)	09/23/21	Email - MXG to Werbner and Farber	
847)	09/23/21	Letter - Brian E. Mason to Sarah B. Rogers	
848)	09/24/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Response to Mason's 9/21/21 letter	
849)	09/24/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Dashboard Safety Concerns	
850)	09/24/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Mclean deposition	
851)	09/24/21	Letter - Brian E. Mason to Sarah B. Rogers re Depositions and FRA	
852)	09/24/21	NRA's Weekly Status Report, ECF 377	
853)	09/24/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Dashboard Safety Concerns	
854)	09/28/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard	
855)	09/28/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard	
856)	10/01/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Response to Mason's 09/28/21 letter	
857)	10/01/21	Letter - Sarah B. Rogers to Brian E. Mason re Document Production Gaps, Custodian-of-Records Deposition, FRA, and AMc's Privilege Log	
858)	10/01/21	AMc Production Volume 16	
859)	10/01/21	NRA's Weekly Status Report, ECF 380	
860)	10/04/21	Letter - Alessandra P. Allegretto to Christina M. Carroll re Buss Deposition	
861)	10/05/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Retention of Forensic Neutral	
862)	10/07/21	Email - SBR to Mason re NRA v. AMc et al / Discovery	
863)	10/08/21	Letter - Brian E. Mason to Sarah B. Rogers and Cecelia L. Fanelli re Privilege Logs, Third-Party Vendor, and FRA Documents	
864)	10/08/21	NRA's Weekly Status Report, ECF 385	
865)	10/08/21	Joint Status Report on the NRA's Motion to Compel the Depositions of AMc's 30b6 Representative(s) and Records Custodians, ECF 385-1	

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
866)	10/11/21	Email - Kelsey to SBR and CLF re Epiq Forensics	
867)	10/11/21	Ex N1 to Spofford Decl - Letter from C. Fanelli to B. Mason re Additional NRA Dashboard	
868)	10/12/21	Deposition transcript - Gary Goolsby on 10/12/21 (TX)	
869)	10/13/21	Email - SBR to Mason, Carroll and Kelsey re FRA production	
870)	10/13/21	Letter - Laura E. Krabill (Ballard Spahr LLP) to Cecelia L. Fanelli re Qlik Objections	
871)	10/14/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Retention of Forensic Neutral	
872)	10/14/21	Letter - Alessandra P. Allegretto to Martin C. Geagan	
873)	10/15/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Third Party Vendor Imaging of PIP Dashboard and Social Media Accounts	
874)	10/15/21	Letter - Brian E. Mason to Cecelia L. Fanelli	
875)	10/15/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Third Party Vendor Imaging of PIP Dashboard and Social Media Accounts (in response to Mason's 10/15/21 letter)	
876)	10/15/21	Ex N2 to Spofford Decl - Response Letter from B. Mason to C. Fanelli re Additional NRA Dashboard	
877)	10/15/21	Email - Carroll to SBR re Status of AMc's Privilege Log	
878)	10/15/21	NRA's Weekly Status Report, ECF 388	
879)	10/15/21	Jackson - Amended Expert Report	
880)	10/16/21	Email - Mason to SBR, Carroll and Kelsey re Jackson deposition	
881)	10/17/21	Letter - Sarah B. Rogers to Brian E. Mason re Jackson deposition and AMc's late productions	
882)	10/18/21	Declaration of Brian E. Mason dated October 18, 2021	
883)	10/18/21	Expert Report - Mclean (Supplemental Expert Report)	
884)	10/19/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard and Social Media Accounts	
885)	10/19/21	Letter - Brian E. Mason to Cecelia L. Fanelli re PIP Dashboard and Social Media Accounts	
886)	10/20/21	Letter - Brian E. Mason to Sarah B. Rogers re Jackson Deposition	
887)	10/21/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Epiq Global, Inc.	
888)	10/21/21	Letter - Sarah B. Rogers to Brian E. Mason re AMc's objections to FRA production	
889)	10/21/21	Deposition transcript - Andrew Mclean on 10/21/21 (TX)	
890)	10/21/21	Deposition transcript - Wilson Phillips on 10/21/21 (TX)	
891)	10/21/21	Buss - Amended and Updated Expert Report	
892)	10/22/21	Letter - Cecelia L. Fanelli to Brian E. Mason re Mclean deposition	
893)	10/22/21	AMc's Second Amended Privilege Log	
894)	10/22/21	Letter - Kelsey Taylor to Sarah B. Rogers re AMc's Second Amended Privilege Log	
895)	10/22/21	NRA's Weekly Status Report, ECF 390	
896)	10/22/21	AMc's Second Amended Privilege Log	
897)	10/22/21	Hochman - Supplemental Expert Report	
898)	10/22/21	Figure 1 to Hochman's Supplemental Expert Report	
899)	10/23/21	Email - Carroll to CLF, SBR and APA	
900)	10/26/21	Letter - Sarah B. Rogers to Brian E. Mason	
901)	10/27/21	Letter - Laura Devine (Google) to Cecelia L. Fanelli re Subpoena to Google	
902)	10/27/21	Deposition transcript - Daniel Jackson on 10/27/21 (TX)	
903)	10/29/21	Declaration of Brian Mason, dated October 29, 2021 (without exhibits)	
904)	10/29/21	Deposition transcript - Brian Buss on 10/29/21 (TX)	
905)	10/29/21	NRA's Weekly Status Report, ECF 394	
906)	10/29/21	Supplemental Joint Status Report on AMc's Motion to Compel Forensic Risk Alliance Documents, ECF 396	
907)	10/29/21	Bergin - Supplemental Expert Rebuttal Report	
908)	10/29/21	Jackson - Suppmantal Expert Rebuttal Report	
909)	11/12/21	NRA's Supplemental Joint Status Report on AMc's MTC FRA Documents, ECF 403	
910)	11/20/21	Declaration - Cotton With Exhibits	
911)	11/28/21	Triton Digital STRATA website	
912)	11/29/21	Declaration of John Frazer	
913)	11/29/21	Declaration - Trahar dated 11/29/21	
914)	11/29/21	Declaration - Winkler Bill dated 11/29/21	
915)	12/16/21	Screenshots of NRATV Social Media Accounts appended to Declaration of W. McLaughlin	
916)	12/18/21	Declaration - McLaughlin with exhibits	
917)	12/18/21	Exhibit A to McLaughling Declaration	
918)	12/18/21	Exhibit B to McLaughling Declaration - screenshots of existing content from YouTube	
919)	12/18/21	Exhibit C to McLaughling Declaration - screenshots of existing content from Facebook	
920)	12/19/21	Declaration of Gary Goolsby With Exhibits	
921)	12/19/21	Declaration - Mclean	
922)	12/19/21	Declaration - Tedrick dated 12/19/21	
923)	12/20/21	Declaration of Brian Buss With Exhibits	
924)	12/20/21	Declaration of John Frazer	
925)	12/20/21	Declaration of Jonathan Hochman With Exhibits	
926)	12/20/21	Declaration of Larry Kanter With Exhibits	
927)	12/20/21	Declaration of Matthew Klink With Exhibits	
928)	12/20/21	Declaration of Autumn Kraus With Exhibits	
929)	12/20/21	Declaration - LaPierre	
930)	12/20/21	Declaration - Meadows	
931)	12/20/21	Declaration - Spofford dated 12/20/21	
932)	12/20/21	Declaration - Winkler Bill dated 12/20/21	
933)	12/20/21	Declaration - Winkler Brandon dated 12/20/21	
934)	12/20/21	Declaration - Arulandanam	
935)	01/03/22	Declaration - Arulandanam	
936)	01/13/22	Letter from P. Furia to B. Mason dated January 13, 2022	
937)	01/21/22	Letter from B. Mason to P. Furia	
938)	01/21/22	Letter from B. Mason to P. Furia	
939)	01/24/22	Declaration of Michael Erstling, dated January 24, 2022	
940)	01/24/22	Declaration - Supplemental McLaughlin	
941)	01/24/22	Declaration - Arulandanam	
942)	01/28/22	Letter from C. Fanelli to B. Mason, dated January 28, 2022	
943)	01/31/22	Deposition Transcript - William Brewer, on 01/31/2022 (TX)	
944)	1/2/2018-5/1/2018	Jeff Minson and Tony Makris OOP expense reports	AMc-0032589 -- AMc-0032636
945)	1-6-15-1/10/20	Workamajig Invoices	
946)	2011-2019	NRA Tax Fiilngs By Year (ProPublica)	
947)	2015-2019	NRA Payment File Excel (Invoices: NRA payments to AMc / MG (2015 - 2019)	NRA-AMc_00185712
948)	3-18 to 3-29-21	Email thread - A. Allegretto to B. Mason	NRA-AMc_00185707
949)		Workamajig feature overview	
950)		Public Relations Society of America Code of Ethics	

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
951)		American Association of Political Consultants Code of Professional Ethics	
952)		List of User Names with General roles for 2018 and 2019	AMc 001329 - AMc 001332 at 1331
953)		NR - OOP 2016, January - December	AMc-0030575
954)		NR-OOP 2017, January - December	AMc-0031042
955)		NR-OOP 2018, January - September	AMc-0032068
956)		AMc IRS Form 1120	AMcTX-00067938
957)		Hallow to North that WLP will not support OLN for President	NRA-AMc_00059547 / NRA-AMc 00061214
958)		Meadows handwritten notes from 04/24/19 call with OLN	NRA-AMc 00060573
959)		Hallow collection of notes from North regarding 04.24.19 call	NRA-AMc 00060589
960)		Hallow collection of notes from North regarding 04.24.19 call	NRA-AMc 00059595
961)		AMc Agency Handbook (Personnel -- Confidentiality Policies)	Unknown
962)		North contract provided to NRA by hand	
963)		Excerpt from FRA's privilege log	
964)		NRATV Powerpoint Presentation - NRATV 2016 Analytics, dated unclear	AMcTX-00050788
965)	Various	Wayne LaPierre Handwritten Notes	NRA-AMc 00091712-91749
966)	Various	2015-2019 Budgets	NRA-AMc 00140814
967)	Various	PIP invoices	PIP-00003674-PIP-00003675, PIP-00000113-PIP-00000115-IP-00000118, PIP-00003606-PIP-00003609, PIP-00003611-PIP-00003612, PIP-00003593-PIP-00003594, PIP-00000120-PIP-00000123, PIP-00000074-PIP-00000076, PIP-00000081-PIP-00000084, PIP-00004459-PIP-00004465, PIP-00000099-PIP-00000100, PIP-00001080, PIP-00001082-PIP-00001084, PIP-00001086-PIP-00001091, PIP-00001093-PIP-00001096, PIP-00003424-PIP-00003428, PIP-00001085, PIP-00003482-PIP-00003484, PIP-00003491-PIP-00003497, PIP-00000103-PIP-00000104, PIP-00003372-PIP-00003374, PIP-00003441-PIP-00003443, PIP-00003454-PIP-00003456, PIP-00003451, PIP-00003574-PIP-00003576, PIP-00000068-PIP-00000072, PIP-00000079-PIP-00000080, PIP-00000088-PIP-00000089, PIP-00000095-PIP-00000096, PIP-00000101-PIP-00000102, AMcTX-00055818-AMcTX-00055820, PIP-
968)	Year 2015	2015 NRA 990 Form	
969)	Year 2016	2016 NRA 990 Form	
970)	Year 2017	2017 NRA 990 Form	
971)	Year 2018	Ex M to Spofford Decl - NRA Presentation America's Most Patriotic Brand	AMc 002956
972)	Year 2018	2018 NRA 990 Form	
973)	Year 2019	2019 NRA 990 Form	
974)	Year 2020	2019 NRA 990 Form	
975)	Year 2021	NRA 990 Instructions	
976)		AMc timesheets	AMc-055854-55930
977)		Hart to Makris re Meeting	AMcTX-00010697
978)		Email from Makris to Hart re WLP late	AMcTX-00010699
979)		Makris to Hart re WLP body language	AMcTX-00010701
980)		Email from Makris to Hart re Josh	AMcTX-00035767
981)		Email from Hart to Makris re Josh Designation	AMcTX-00035772
982)		Makris to Hart re late start to meeting	AMcTX-00035773
983)		NRATV Powerpoint Presentation - NRATV Year 1 Valuation - Overall Valuation, Valuation by Series	AMcTX-00042333 / AMcTX-00054968
984)		AMc ledger information re cost of services, and other "miscellaneous direct" costs incurred on NRATV-related projects	AMcTX-00053225
985)		Letters dated 10/XX/18 (draft) - Winkler to North and Madrid to Hart re AMc's notice of termination of the Services Agreement	AMcTX-00065396-65400
986)		Dashboard Access rights list	AMcTX-00070051
987)		AMc's T&E Expense Policy	Exhibit 1 of Brandon Winkler deposition (not produced by AMc or NRA)
988)		Vendor History Report summarizing all payments made by NRA to AMc from 2009 - 2020, i.e., \$230.5m	NRA-AMc_00185685-185689
989)		NRATV - Thomas the Train KKK Video	
990)		How to Work With Law Firms, One of PR's More Complex Clients	
991)		Working with Your Public Relations Firm (https://prcouncil.net/wp-content/uploads/2011/04/working).	
992)		Megan Allen email exchange with Nader Tavangar – May 2016.	
993)		Internal Control—Integrated Framework issued by Committee of Sponsoring Organizations of the Treadway Commission (May 2013 update), available at https://www.coso.org/Pages/ic.aspx	
994)		Excerpt of Ackerman's Volume 16 production index	
995)		Excerpt from Neil T. Bendle et al., Marketing Metrics the Managers Guide to Measuring Marketing Performance	
996)		NRATV Social Media Accounts (including, but not limited to Facebook, Twitter, Instagram, and YouTube as they publicly exist)	
997)		Index Vol0001-2, AMcTX-00260560	
998)		Index Vol0001-2, AMcTX-00261298	
999)		Distinguish Between Primary and Secondary Sources, Univesity of California, Santa Cruz webpage	
1000)		See also screencapture-qlik-sense-am-sense-app-0c94cb7d-8713-4c60-8a3c-75d20cba62ed-sheet-KpjJDCJ-stateanalysis-2021-09-27-19 24 24.	

NRA - Exhibit List, as of February 07, 2022			
Exhibit	Date	Description	Bates numbers
1001)		screencapture-qlik-sense-am-sense-app-0c94cb7d-8713-4c60-8a3c-75d20cba62ed-sheet-b91193d0-14f4-4071-8002-1721f563bdb0-state-analysis-2021-09-27-18 46 23	
1002)		screencapture-qlik-sense-am-sense-app-0c94cb7d-8713-4c60-8a3c-75d20cba62ed-sheet-gvtTC-state-analysis-2021-09-27-18 44 15	
1003)		screencapture-qlik-sense-am-sense-app-23d92e56-3124-4919-a420-909bfed3aeac-sheet-gtkKaUY-state-analysis-2021-09-27-18 56 37	
1004)		screencapture-qlik-sense-am-sense-app-0c94cb7d-8713-4c60-8a3c-75d20cba62ed-2021-10-20-08 46 58.pdf	
1005)		screencapture-qlik-sense-am-sense-app-23d92e56-3124-4919-a420-909bfed3aeac-2021-10-20-08 57 26.pdf	
1006)		AWS Regions and Availability Zones	
1007)		Definition of Forensic Image from whatis.techtarget.com	
1008)		Screenshot of Qlik Bad Security Certificate Warning	
1009)		AWS knowledge center- copying S3 objects	
1010)		AWS- Data transfer within the same AWS Region	
1011)		AWS- Pricing	
1012)		NRA Video Content Executive Dashboard (The actual live Dashboard)	
1013)		Commentary: "Half my Digital Advertising is wasted..." by Marc Pritchard	
1014)		"Which half is wasted?": Controlled Experiments to measure online-advertising effectiveness by David Reiley	
1015)		Effective Frequency-Marketing Dictionary.org	
1016)		Super Bowl television ratings- Wikipedia	
1017)		History- Media Rating Council	
1018)		Accredited Services- Media Rating Council	
1019)		AMA Code of Conduct	
1020)		Ethics in Public Relations- George Washington University	
1021)		Code of Conduct- DJE Holdings	
1022)		Tableau Software- Wikipedia	
1023)		Pat Hanrahan- Wikipedia	
1024)		The Importance of a Marketing Report- Whatagraph.com	
1025)		Google third-party policy	
1026)		Data Compression- Wikipedia	
1027)		screencapture-qlik-sense-am-sense-app-0c94cb7d-8713-4c60-8a3c-75d20cba62ed-sheet-b91193d0-14f4-4071-8002-1721f563bdb0-state-analysis-2021-09-03-01 10 35	
1028)		screencapture-qlik-sense-am-sense-app-23d92e56-3124-4919-a420-909bfed3aeac-2021-09-01-19 16 42	

The NRA may, at its sole election, request that the Court take judicial notice of, or otherwise offer any of, the below listed documents into evidence at the time of the trial. The NRA further reserves the right to offer any documents, which may be designated or offered by any Defendant. The NRA reserves the right to offer or use any exhibits (whether designated below or by the NRA) as may be necessary for cross-examination, impeachment, or rebuttal.

Dated: February 7, 2022

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF/COUNTER-
DEFENDANT NATIONAL RIFLE
ASSOCIATION OF AMERICA**

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2022, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on all counsel of record by a manner authorized by the Federal Rules of Civil Procedure.

/s/ Cecelia L. Fanelli
Cecelia L. Fanelli